WA 2917

5/6/1987

NARRATIVE INSPECTION REPORT
Resource Conservation and Recovery Act (RCRA) Chapter 173-303 Washington Administrative Code (WAC) **Compliance Inspection**

FILE COPY

Facility: Chemical Processors, Inc.
Pier 91
Seattle, Washington 98119

Date of Inspection: May 6, 1987

ID Number: WAD000812917

Inspector: Laurence Ashley

Purpose: This inspection was intended to supply information concerning compliance with applicable hazardous waste requirements under WAC 173-303 and the Federal requirement for semi-annual inspections of TSD facilities that receive off-site wastes under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA).

General Facility and Process Information

The Pier 91 facility of Chemical Processors, Inc. is a former U.S. Naval Facility located on the northern waterfront of Elliot Bay. Pier 91 has developed into an oil and recycling terminal, handling bilge and ballast waters received by barge and tanker trucks. Chemical Processors lease about sixty percent (60%) of the Pier 91 unit to Pacific Northern Oil as a marine fuel depot.

The maximum capacity of the waste oil reclamation and oily industrial liquid waste treatment operations is 8.5 million gallons. Waste oil is rendered reusable by tank treatments involving the separation of impurities and breaking of emulsions. All the processed oil is currently sold to Pacific Northern Oil as cutting stock in marine oils. The facility treats liquid wastes contaminated with low level heavy metals and/or other low concentration hazardous wastes which can be treated to render the liquids non-hazardous. The main waste types received at the facility include oils. oily sludges, emulsified oil and water, oily water, coolants and non-oily water.

Chemical Processors, Inc. is in a lease agreement with the Port of Seattle.

Notification and Permitting:

Notified August 13, 1980 as a Generator and TSD.

Revised Notification: May 1, 1984 as a Generator and TSD and adding waste number WT02.

Revised Notification: March 28, 1985 as a Generator and TSD

Form 1: Washington State Dangerous Waste Permit General Information. Dated July 2, 1985. Nature of Business: "Pier 91 is a waste oil reclamation facility. By utilizing tank treatment reusable oil is reclaimed by separating the impurities. In addition liquid wastes containing low concentrations hazardous waste contaminated liquids are treated to remove or destroy the contaminants."

Form 3: Dangerous Waste Permit Application. Dated July 2, 1985. Revisied Application: Facility has an Interim Status Permit. Process Design Capacity: S02: 9,036,090 Gallons; T01: 40,000 Gallons/Day; T04: 100,000 Gallons/Day. Description of Dangerous Wastes: K048, K049, K050, K051, K052, D001, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011, F001, F002, F003, W001.

Facility Inspection - Opening Conference

Mr. Raad and Mr. Ashley met with Mr. Ressler, Ms. Aldridge, Mr. Stefani, and Mr. Moody of Chemical Processors, Inc. and Ms. Chance of The Boeing Company in Mr. Moody's office. Mr. Ashley went over the reason for the inspection and the reason for Mr. Raad's presence. All were introduced and Mr. Moody went over the general operations of the facility. He explained that the operations have not changed since 1980 in any meaningful way. No CERCLA wastes have been received by the facility to date in 1987. The general system for receiving wastes is the profile system. When the facility is asked to receive wastes from a generator a profile sheet is sent to the generator to be filled out and returned. The profile sheet is examined and a determination whether the facility will or will not receive the wastes is made. The Manifest System is used for tracking the wastes from the generator to and through the facility to the final destination. The facility generates wastes from the treatment system.

how?

Facility Inspection - General

The building in which the office is located contains: The main office, sample holding area; the boiler; chemical storage area; storage area for containerized wastes; and fire fighting apparatus. The facility has a foam fire fighting system which is checked yearly. Part of the office is used for a laboratory which contains instruments for analyzing waste samples. The main lab area is in a small building directly south of the office building and is used for doing the wet chemistry on the samples of shipments incoming. The foam apparatus is directly northwest of the office building.

The tank area is south of the office building and is bermed to contain all of the contents of the tanks.

Demulsification of emulsified liquids or oils occurs in Tanks 105, 107 or 110. These tanks have a capacity of 42,000 gallons. Emulsified coolant is isolated in Tank 112. The emulsion is treated with calcium chloride and heated to 190 degrees F by steam generated by the boiler. The treated wastewater is analysed for pH, phenol and Chromium +6 prior to transfer to wastewater treatment Tanks 90, 94, 96, 97, 98 or 100. The sludges derived from the treatment of the emulsified liquids are transferred to Tanks 106, 108, 109 or 111.

Waste oil received with high bottom sediment and water content (25-30%) requires treatment in Tanks 105, 107 and 110. The waste oil is heated indirectly to 190 degrees F and sodium silicate is added for sediment and water removal. The oil is pumped to Tank 99 for blending and resale. Residual sludge is transferred to Tanks 106, 108, 109 or 111 for dewatering.

Upon receipt and verification of phenol contaminated oil or water, the waste stream is isolated in Tanks 115, 116, 117 or 165 and treated in Tank 112. The treatment of phenol-contaminated oil or water involves chemical oxidation by use of sulfuric acid, ferrous sulfate and hydrogen peroxide or potassium permanganate. The resultant product is alleged to be a aliphatic hydrocarbon.

Chemical reduction treatment occurs in Tanks 115, 116, 117, 165 or Rec Tank. Reduction is the treatment used to reduce waste containing concentrations of chromium +6 to chromium +3. Wastes loads with metal concentrations are treated by pH adjustments, clarification and precipitation in Tanks 96, 97, 98, 90, 94 and 100. The pH is initially reduced to 2-3 using sulfuric acid. The pH is then readjusted for metal precipitation by use of sodium hydroxide to a pH of 9.5-10.5. Residual sludges are transferred to Tanks 106, 108, 109 or 111 for dewatering and wastewater is analyzed to assure meeting METRO discharge permit limits. The reduction of chromium +6 is accomplished by the use of sodium metabisulfite.

The area around the tanks is paved. Runoff or spills are collected in sumps and pumped to appropriate Tanks for handling.

As the facility has been used for oil/fuel storage since the early 1940s, there is evidence that oil is in the ground under the facility. The facility has not always been paved. The paving was done in 1986.

Items of Environmental Concerns:

The Port of Seattle is concerned by the evidence of oil in the ground. Chemical Processors, Inc. are going to do some more examining the soil to determine if there is a need for removal. The evidence indicates that the oil has not reached the water to date. The data indicates that the oil is like a heavy tar.

Because of the evidence of contaminated ground at the facility, it will be indicated to the facility to update the closure plan to include the costs of testing and determining the extent and type of contamination and potential cost of removal. At present, RCW 90.48 can be used for cleanup if necessary. As the data comes in, the cleanup if needed may come under WAC 173-303.

Alleged exposed asbestos in the insulation around the piping in the boiler area of the main building.

Update oil/water separator with sensor installation to indicate fullness of tank.

Backflow preventor equipment may be necessary for the facility.

The pumping/piping area between Pacific Northern Oil and Chemical Processors, Inc. is in need of cleaning up. The area should be covered to prevent water from entering the area.

DANGEROUS WASTE COMPLIANCE CHECKLIST/QUESTIONNAIRE, CHAPTER 173-303 WAC

March 1987

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PART I: COVER INFORMATION

This part of the checklist/questionnaire is applicable to all persons who handle dangerous waste. This cover information includes a review of the Notification Form and confirmation of other general information necessary to maintain accurate files and records.

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I. INSPECTOR INFORMATION

WDOE Inspector: Lawrence Ashley

: _____

Phone: ~~(206) - 885-1900 -~~ 867-7014

Office (circle one): (NW) SW C E IND

Date of THIS Inspection: May 6, 1987

Date of LAST Inspection: July 15, 1986

Other Inspectors Present:

Name: Ali Raad Agency: Ecology Phone #: ~~(206) 885-1900~~ 867-7062

: _____ : _____ : _____

INSPECTION TYPE

Generator ✓

Transporter N/A

Treatment ✓

Storage ✓

Disposal N/A

Recycler ✓

RCRA ✓

State-only ✓

2. BUSINESS INFORMATION

Business Name: Chemical Processors, Inc EPA/State ID #: WAD000812917

Address: Pier 91

Seattle

Zip Code: 98119 County: King

Business Location (If: _____

Other Than Address) _____

Contact Person: _____ Phone #: _____

: _____ : _____

Were samples taken during the inspection? Yes ✓
No

If yes, where and of what were samples taken:

Were samples split with the owner/operator? Yes _____
No _____

Were chain of custody procedures followed? Yes _____
No _____

DANGEROUS WASTE COMPLIANCE CHECKLIST/QUESTIONNAIRE, CHAPTER 173-303 WAC
March 1987

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PART II: GENERATORS

This part of the checklist/questionnaire is applicable to any person whose actions or processes generate dangerous wastes, and are thus identified as generators under Chapter 173-303 WAC. This part of the checklist/questionnaire must be completed for any person who is a generator, including transporters or TSD facilities which generated dangerous waste.

* *

Generator Name: Chemical Processors, Inc. EPA/State ID #: WAD000812917

Inspectors Name: Laurence Ashley Date: May 6, 1987

Has this generator generated dangerous waste since the date of his last inspection, or since the date he was determined to be a generator if this is his first inspection? (If "No," explain how the generator assures that no dangerous wastes are generated in the Comments section, below, and do not complete the remainder of this part of this checklist/questionnaire.)

Yes ✓

No __

Comments: The wastes this facility generates are from the sludges removed during cleaning of oil storage tanks. Manifested as WT02 DW wastes.

		Yes	No
1.	WASTE DETERMINATION (WAC -016 and -017)		
A.	Has the generator properly determined which of his secondary materials are solid wastes under WAC 173-303-016?	✓	
B.	Does the generator generate secondary materials to be used in a manner constituting disposal, burned for energy recovery, accumulated speculatively, or which are inher ntly waste-like?		✓
	If yes, the following three exemptions do not apply.		
C.	Does the generator use or reuse secondary materials as ingredients in an industrial process to make a product		

DANGEROUS WASTE COMPLIANCE CHECKLIST/QUESTIONNAIRE, CHAPTER 173-303 WAC
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Address: Pier 91

Seattle

Zip Code: 98119 County: King

Business Location (If: _____

Other Than Address) _____

Contact Person: _____ Phone #: _____

: _____ : _____

Business Representative Present During Inspection:

Name: Bob Moody Title: Plant Manager Phone #: (206) 767-0350

: Peter Ressler : Compliance : 767-0350

: Rosemary Aldridge : Fish/Permit writer : 767-0350

3. NOTIFICATION FORM REVIEW

Notification Form Filed: Yes ✓ No ____ Date: ____

Notification Form Revisions: Yes ✓ No ____ Date: ____

Date: ____

Date: ____

Is the information provided in the most recent Notification Form still accurate? (If not, note any deficiencies in Comments, below.) Yes ✓ No ____

Comments: ____

4. ADDITIONAL INSPECTION INFORMATION

Time Inspector Entered Site: 0910

Left Site: 1010

Were photographs taken during the inspection? Yes ____

If yes, how many? ____ No ✓

(Note: A brief description of the pictures should be prepared and included in the inspection report.)

Were many problems encountered regarding:

Permission to enter the site: None

Permission to have access to any areas on the site: None

Permission to have access to any records: None

Other: ____

Were samples taken during the inspection? Yes ____
No ✓

If yes, where and of what were samples taken:

_____

_____

_____

_____

Were samples split with the owner/operator? Yes ____
No ____

Were chain of custody procedures followed? Yes ____
No ____

DANGEROUS WASTE COMPLIANCE CHECKLIST/QUESTIONNAIRE, CHAPTER 173-303 WAC
March 1987

* *

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Inspectors Name: Laurence Ashley Date: May 6, 1987

Has this generator generated dangerous waste since the date of his last inspection, or since the date he was determined to be a generator if this is his first inspection? (If "No," explain how the generator assures that no dangerous wastes are generated in the Comments section, below, and do not complete the remainder of this part of this checklist/questionnaire.)

Yes ✓

No ___

Comments: The wastes this facility generates are from the sludges removed during cleaning of oil storage tanks. Manifested as WT02 DW wastes.

		Yes	No
1.	WASTE DETERMINATION (WAC -016 and -017)		
A.	Has the generator properly determined which of his secondary materials are solid wastes under WAC 173-303-016?	✓	___
B.	Does the generator generate secondary materials to be used in a manner constituting disposal, burned for energy recovery, accumulated speculatively, or which are inher ntly waste-like?	___	✓
	If yes, the following three exemptions do not apply.		
C.	Does the generator use or reuse secondary materials as ingredients in an industrial process to make a product		

provided the materials are not being reclaimed? — ✓

D. Does the generator use or reuse secondary materials or effective substitutes for commercial products provided the materials are not being reclaimed? — ✓

E. Does the generator return secondary materials as raw material feedstock to the original process from whcih they were generated without first being reclaimed? — N/A

F. If the generator has claimed that any of his materials are not wastes, can the generator demonstrate and provide documentation that a known market or disposition for the material exists and that he meets the terms of the exemption or exclusion? — —

2. DESIGNATION (WAC -170(1)).	Yes	No
A. Does the generator properly designate his dangerous wastes as DW and/or EHW?	✓	—
B. Does the generator have adequate information to perform these designations?	✓	—
C. If designation involves performing tests and analyses of his wastes:		
a. Does the generator have on-site, or have ready access to, equipment for obtaining and preserving waste samples for tests?	✓	—
b. Do the waste analyses and test results provide enough information to accurately designate the generator's dangerous wastes (WAC -170(1)(a))?	✓	—
c. Does the generator retain copies of all waste analyses used to designate his dangerous wastes for a minimum of three years (WAC -210(3))?	✓	—

Comments The facility is mainly a waste oil recycler. Bulk shipments come in, the oil is removed, stored and sold to a buyer for blending stock in marine shipping. The secondary materials are (as is understood) the sludges (materials that separate from the stored oil) are generated during cleaning of storage tanks.

3. RECYCLING ACTIVITIES

	Yes	No
A. Are any of the generator's wastes recycled?	___	✓

If no, skip this section (3) and continue with section 4.

If yes, the recyclable material may fall into one of three categories:

- o It may be "exempt" under WAC 173-303-016, -017, -071, or -120(2);
- o It may be subject to special standards under 173-303-500 through 173-303-525; or
- o Where no special standards exist, any storage prior to recycling is fully regulated either under the usual generator accumulation or facility storage provisions, while the recycling process itself is not regulated. (WAC -120(4))

The remainder of this section identifies those recyclable materials for which special standards exist. REMINDER: These special standards apply to the recycling of dangerous wastes. Certain recycling practices do not involve wastes at all.

B. Used Oil

a. Does the generator generate used oil to be burned for energy recovery?	___	✓
If yes, the generator standards do not apply to these wastes (although marketer and/or burner standards may apply).		
b. Does the generator burn their own or do-it-yourselfer used oil in used oil-fired space heaters with a maximum capacity of not more than .5 million Btu per hour, which is vented to the outside air?	___	✓
If yes, neither the generator or burner standards apply to these wastes.		
c. Does this person market used oil directly to a person who burns it for energy recovery?	___	✓
i. For persons marketing used oil that meets the specifications, are records maintained for at least three years of test results (or other information) to document that the used oil meets all of the specifications in Table 1 of WAC -515(1)? (WAC -515(4)(b)(i))	___	___
Does the marketer also record in an operating log and keep for three years the following		

information on each shipment of used oil that meets the specifications:

name and address of receiving facility;
quantity of used oil delivered;
date of shipment or delivery; and
cross-reference to the record of test analyses or other information used to make the determination that the oil meets the specifications?
(WAC -515(4)(b)(vi)(A))

ii. Does the marketer market off-specification used oil only to industrial facilities, boilers, or other marketers? (WAC -515(2)(a))

iii. Has the marketer notified WDOE of his used oil management activities?
(WAC -515(4)(b)(iii))

iv. When a marketer initiates a shipment of off-specification used oil, does he prepare and send to the receiving facility an invoice containing at least:

an invoice number;
the marketer's and receiving facilities' ID#s, names and addresses;
quantity of used oil
date(s) of shipment or delivery; and
a statement that the used oil is subject to WDOE regulation under WAC 173-303-515?
(WAC -515(4)(b)(iv))

v. Before first shipment of off-specification used oil to a burner or other marketer, does the marketer obtain a written and signed notice from the burner or marketer certifying that:

- o the burner or marketer has notified WDOE of his activities, and
- o if a burner, will burn the off-specification used oil in an industrial furnace or boiler?

vi. Before a marketer accepts the first shipment of off-specification used oil from another marketer, does he provide the other marketer with a one-time written and signed notice certifying that he has notified WDOE of his used oil management activities?
(WAC -515(4)(b)(v)(B))

vii. Does the marketer keep records of invoices and certification notices for shipments of off-specification used oil at least three years?
(WAC -515(4)(b)(vi)(B))

C. Spent-lead Acid Batteries — Yes: ___ No: ✓

Does the generator generate spent-lead acid batteries destined for recycling?

If yes, the generator standards do not apply to these wastes.

D. Precious metals

Does the generator generate precious metals (i.e., gold, silver, platinum, paladium, irridium, osmium, rhodium, ruthenium, or any combination of these) destined for recovery? — Yes: ___ No: ✓

If yes, only the next two questions apply.

a. Does the generator have an ID#? (-525(1)(b)(i)) — Yes: ___ No: ___

b. Does the generator comply with the manifest requirements of WAC 173-303-180? (-525(1)(b)(ii)) — Yes: ___ No: ___

Complete Section 3 of this Part (II) to determine this.

E. Fully regulated

Does the generator generate:

i. dangerous waste to be burned for energy recovery? — Yes: ___ No: ___
ii. recyclable materials that become products used by the general public in a manner constituting disposal? — Yes: ___ No: ___
iii. state-only wastes to be recycled? — Yes: ___ No: ___
iv. any other recyclable materials not exempt under WAC 173-303-017 or 173-303-071? — Yes: ___ No: ___

If yes to any of these questions, then full generator requirements apply. Complete the rest of this Part (II).

Comments The facility is a oily water treatment unit. The water is removed from the oil and the oil is sold as a blend for (fuel used by) the marine shipping industry. Water is discharged to METRO - Sludge is manifest to CSSI

4. SHIPPING DANGEROUS WASTE OFF-SITE — Yes: No:

A. Does he generator ship any dangerous wastes off-site that must have accompanying manifests as required under WAC -180? (If "No," do not complete Section 5. Manifests, Section 6. Preparing Dangerous Waste for Transport, and Section 7. Import/Export of Dangerous Waste.) — Yes: ✓ No: ___

B. Does the generator ever also transport his own wastes? (If "YES" be sure to also complete Part III: Transporters of this checklist/questionnaire.)

Yes	No
—	✓

C. List below any "outside" transporters the generator uses to transport his dangerous wastes off-site:

Transporter Name	EPA/State ID #
Resource Recovery Corp.	WA0061672812

Comments Resource Recovery Corp is a solely owned subsidiary of Chemical Processors, Inc.

5. MANIFESTS (WAC -180).

	Yes	No
A. Does the generator retain a completed copy of each manifest signed by the initial transporter for at least three years, or until he receives a signed copy from the designated facility indicating receipt of the waste which copy he keeps for at least three years from the date the initial transporter accepted the waste (WAC 210(1))?	✓	—
B.a Does the generator use an alternative manifest mechanism for moderate risk wastes as provided in WAC -170(4)(a)?	—	✓
b. Has this alternative manifest mechanism been approved by WDOE?	—	—
c. Has the generator complied with the terms and conditions of, and properly implemented the alternative manifest mechanism? (If not, specify what failures occurred under Comments, below.)	—	—

Note: If all of the dangerous wastes handled by the generator are moderate risk wastes covered by an alternative manifest mechanism, then complete only items G., H., I,, and J,, below. If only some of the generator's dangerous wastes are moderate risk wastes covered by an alternative manifest mechanism, then do complete all remaining items, below.

		Yes	No
C.	Does the generator use the Uniform Manifest (WAC -180(1))?	✓	
	Does the generator include the additional WDOE information required for the Uniform Manifest:		
	a. In Item D - the first transport's telephone number (WAC -180(1)(a))?	✓	
	b. In Item F - the second transporter's telephone number, if a second transporter is used (WAC -180(1)(b))?	✓	
	c. In Item H - the designated receiving facility's telephone number (WAC -180(1)(c))?	✓	
	d. In Item I - the dangerous waste number for each corresponding waste entered and described under Item 11 (WAC -180(1)(d))?	✓	
D.	Is signature of, and date of acceptance by the transporter obtained prior to transport (WAC -180(3)(a))?	✓	
E.	Does the generator retain one copy, signed by the transporter, and give remaining copies to the transporter at time of transport (WAC -180(3)(a) and (b))?	✓	
F.	Has the generator received copies of all his manifests, signed, dated, and returned by the receiving TSD facilities?	✓	
	Were <u>all</u> of these received within forty-five days after the waste was transported? (If "Yes," do not complete the next item, G., regarding Exception Reports.)	✓	
G.a.	If the generator does not receive a copy of the manifest with the handwritten signature of the designated facility's owner/operator within thirty-five days after the initial transporter accepted the waste, does he contact the transporter(s) and/or facility to determine the status of the dangerous waste shipment (WAC -220(2)(a))?	✓	
b.	Has the generator submitted in writing to WDOE an Exception Report for each manifest not signed, dated, and returned by the receiving TSD facility within forty-five days of transport (WAC -220(2))?		✓

c. List the dates during the previous year that Exception Reports were submitted: _____

_____

_____

d. Were the waste shipments described in these Exception Reports finally delivered to a TSD facility? If not, specify which shipments were not delivered or not found: — Yes ✓ No

e. Does the generator retain copies of all Exception Reports for a minimum of three years (WAC -210(2))? — ✓ If and when a report is required

H. If the transporter is unable to deliver the dangerous waste shipment to either the designated or alternate facility, does the generator either designate another facility for delivery or instruct that the shipment be returned to him when contacted by the transporter for further instructions (WAC -180(3)(c))? — ✓

I. When shipping dangerous waste within the United States solely by water (bulk shipment), does the generator send three copies of the manifest signed and dated by himself and the initial transporter to either the owner/operator of the designated facility, or to the last water transporter to handle the waste in the U.S. if the waste is exported by water (WAC -180(3)(d))? — N/A Does not ship by water

J. For rail shipments within the United States which originate at the site of generation, does the generator send at least three copies of the manifest signed and dated by himself and the initial transporter to either (WAC -180(3)(e)): — N/A Does not ship by rail.

a. The next nonrail transporter, if any?

b. The designated facility if transported solely by rail?

c. The last rail transporter to handle the waste in the U.S. if exported by rail?

Comments The facility manifests all wastes by the uniform manifest system. The company finds that record-keeping is ~~easier~~ easier and straightforward.
No special reports to date.

6. PREPARING DANGEROUS WASTE FOR TRANSPORT OFF-SITE (WAC -190).

	Yes	No
A. Does the generator package his dangerous waste for transport in accordance with U.S. DOT rules, 49 CFR Parts 173, 178 and 179 (WAC -190(1))?	✓	
B. Does the generator label and mark each of his packages for shipment in accordance with U.S. DOT rules, 49 CFR Part 172 (WAC -190(2) and (3)(a))?	✓	
C. Does the generator mark each package containing 110 gallons or less of dangerous waste, and display in accordance with 49 CFR 172.304, the following or equivalent words and information (WAC -190(3)(b)): HAZARDOUS WASTE - State and Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority, and the Washington State Department of Ecology or the United States Environmental Protection Agency. Generator's Name and Address _____. Manifest Document Number _____.	✓	
D. Does the generator placard, or offer to the transporter all appropriate placards, in accordance with U.S. DOT rules 49 CFR Part 172 Subpart F (WAC -190(4))?	✓	

Comments _____

_____

_____

_____

_____

_____

7. IMPORT/EXPORT OF DANGEROUS WASTE (WAC -230).

	Yes	No
A. Does the generator import or export any dangerous waste? (If "No," skip the remainder of the questions in this item.)		✓
B. If the generator exports dangerous waste to other countries, he must comply with 40 CFR Part 262.50. However, Ecology does not yet have authority to implement these standards because they were adopted unde the authority of HSWA.		
C. If the generator imports waste from foreign countries, does he:		

a. Comply with all other requirements for generators (WAC -230(2))? Yes ___ No ___

b. Comply with the Uniform Manifest requirements (including additional WDOE information), except that in place of the generator's name, address, and ID # he enters the name and address of the foreign generator and the importer and the importer's ID #, and in place of the generator's signature on the certification the importer or his agent signs and dates the certification and obtains the transporter's signature (WAC -230(2))? ___ ___

Comments The facility receives most of its waste from the Marine Industry / The Boeing Company.

8. TRIPLE RINSING (WAC -230(3), (4) AND -160). Yes No

A. Does the generator triple rinse all containers which are empty and which held EHW in accordance with WAC -160? When necessary

B. Does the generator either reuse rinsate from any rinsing operations (including rinsing of tote tanks, truck or railroad tank cars, WAC -230(4)) in a manner consistent with the original product, or else determine if the rinsate is designated as dangerous waste and, if so designated, handle it in accordance with Chapter 173-303 WAC and Chapter 90.48 RCW? When necessary

Comments ___

9. NON-PERMITTED SPILLS AND DISCHARGES (WAC -145). Yes No

A. Have there been any nonpermitted spills or discharges on the generator's site which have not been reported to WDOE? ___ ✓

If yes, describe what wastes were spilled and approximately what quantities:

		Yes	No
B.	If the generator has any nonpermitted spill or discharge to ground or to surface or ground waters, does he:		
	a. Notify the appropriate regional office of WDOE (WAC -145(2)(a))?	✓	
	b. Notify all local authorities in accordance with the local emergency plan (if necessary, by checking with the local emergency service coordinator and fire department to determine notification responsibilities under the plan) (WAC -145(2)(a))?	✓	
C.	If the generator has any nonpermitted spill or discharge which results in emissions to the air, does he:		
	a. Notify the local air pollution control authority if the spill or discharge is in western Washington (WAC -145(2)(b))?	✓	
	b. Notify the appropriate regional office of WDOE if the spill or discharge is in eastern Washington (WAC -145(2)(b))?	✓	
	c. Notify all local authorities in accordance with the local emergency plan (if necessary, by checking with the local emergency service coordinator and fire department to determine notification responsibilities under the plan) (WAC -145(2)(b))?	✓	
D.	When the generator has any nonpermitted spill or discharge, does he:		
	a. Take appropriate immediate action to protect human health and the environment (WAC -145(3))?	✓	
	b. Whenever required by WDOE:		
	i. Clean up all released wastes or take such other actions as may be required or approved by federal, state, or local officials acting within their responsibilities (WAC -145(3)(a)(i))?	✓	
	ii. Designate and treat, store, or dispose of all soils, waters or other materials contaminated by the spill or discharge (WAC -145(3)(a)(ii))?	✓	

iii. Restore the area impacted by the spill or discharge and replenish resources, if the impacted property is not owned by the generator (WAC -145(3)(a)(iii)?

Yes	No
✓	

Comments See the attached facility Contingency Plan dated May, 1987

10. ANNUAL REPORTS

	Yes	No
A. Does the generator retain copies of Annual Reports for a minimum of three years (WAC -210(2))?	✓	
B. Is the generator generating any wastes which were not reported on his latest Annual Report and which should have been reported?		✓

If "Yes," describe these wastes:

Description/Dangerous Waste #	EHW/DW	Quantity (Month/Batch)

C. Are there any wastes which were reported on his latest Annual Report which the generator is no longer generating?		✓

If "yes," provide the waste description and Dangerous Waste # as they appeared on the latest Annual Report:

Comments _____

11. ADDITIONAL REPORTS.

	Yes	No
a. Does the department require the generator to submit any additional reports as provided under WAC -220(3)?	___	___
If "Yes," were these reports accurate and submitted in a timely manner? (Specify what additional reports are required and note any deficiencies under Comments, below.)		
b. If the generator sends labpacks off-site, does he keep an itemized listing of the chemicals, their concentrations and quantities per labpack for purposes of preparing annual reports and in case of emergency during shipment? (WAC -161(6))	___	___

When necessary/requested all reports have been submitted in a timely manner

Comments _____

12. GENERATOR ACCUMULATION (WAC -200).

This portion of the generator checklist/questionnaire is only applicable to generators who accumulate dangerous waste on-site as allowed for in WAC -200. To determine whether or not this portion is applicable, first complete item A.,

below. If, after completing item A., it is determined that the generator does accumulate dangerous waste on-site, then complete all of the questions under this Section 12. Generator Accumulation. If, after completing item A., it is determined that the generator does not accumulate dangerous wastes, then do not complete the remaining questions under this section 12. Generator Accumulation. (Note: Under certain circumstances, WAC -200(1)(e) allows an accumulating generator who keeps his waste less than ten days to be exempt from all or part of sections WAC -330 through -360. If this is the case for this generator, then complete only item A. and the remaining applicable items of this section 12. Generator Accumulation.)

	Yes	No
A. Determining Whether Or Not The Generator's Accumulation Is Subject To WAC -200.		
a. If the answers to <u>both</u> of the following questions are "Yes," then do not complete the remaining generator accumulation questions (they will be asked later under Part IV: Facilities). If either or both questions are answered "No," then continue the remaining questions in this item A.		
i. Does the generator operate an on-site dangerous waste management facility?	✓	
ii. Are <u>all</u> of the generator's dangerous wastes placed in and managed (including stored, treated or disposed) at his on-site facility as soon as they become subject to regulation?	✓	
b. If the answer to <u>any</u> of the following questions is "Yes," then the generator is subject to the generator accumulation standards of WAC -200(1)(e), and the remaining items of this section 12. Generator Accumulation must be completed. If the answer to <u>all</u> of the following questions is "No," then the generator is not subject to WAC -200(1)(e).		
i. Does the generator ever generate more than 2,200 lbs. (1,000 kg) of dangerous waste in a month or batch, or ever accumulate more than 2,200 lbs. (1,000 kg) on-site at any time?	✓	
ii. Does the generator ever generate (per month or per batch) or accumulate on-site at anytime more than 2.2 lbs. (1.0 kg) of EHW discarded chemical products (WAC -081)?		✓
iii. Does the generator ever hold dangerous wastes on-site for more than ten days after the date the waste quantity first exceeds the applicable quantity exclusion limit?	✓	

iv. Even though the generator removes all wastes in less than ten days, has he been required by WDOE to comply with some or all of WAC -330 through -360? — Yes — No

Comments _____

B. Ninety-Day* Accumulation Limit. — Yes — No

* The time limit is one hundred eighty days for moderate risk wastes held in containers or tanks as allowed by WAC -170(4)(b). One hundred eighty days is also the time limit for persons who generate less than 2200 pounds per month of dangerous waste.

a. Are all wastes:
   i. shipped to an off-site TSD, or
   ii. placed in an on-site permitted storage area, or
   iii. recycled on-site, or
   iv. treated in containers or tanks, with regional approval

within ninety days* or less (WAC -200(1)(a))?

b. In those cases where wastes were not sent to a facility within ninety days*, did WDOE grant extensions (maximum thirty days) as allowed by WAC -200(1)(a)?

c. How does the generator determine when the ninety-day* accumulation period begins:

   i. When the waste is first generated (WAC -200(2)(a))?

   ii. If he is a small quantity generator, when his aggregated quantity first exceeds the exclusion limit (WAC -200(2)(b))?

   iii. At satellite areas, when each 55 gallon container of dangerous waste or one quart of acutely hazardous waste is full (WAC -200(2)(c))?

Comments The facility is a storage facility.

C. Personnel Training (WAC -330).

		Yes	No
a.	Does the generator have a written personnel training plan, kept at the generator's site (WAC -330(2))?	✓	
b.	Does the personnel training plan include the following documents and records:		
i.	For each position related to the handling of dangerous waste on-site, the job title, name of employee filling each job, and the job description, including requisite skills, education, qualifications and duties for each position (WAC -330(2)(a))?	✓	
ii.	Written description of type and amount of introductory and continuing training needed for each position (WAC -330(2)(b))?	✓	
iii.	Records documenting that employees have received and completed the necessary training (WAC -330(2)(c))?	✓	
c.	Are training records retained for at least three years after an employee last worked for the generator, or until the generator closes his site, whichever occurs first (WAC -330(3))? (Note: Records may have been transferred within the company to follow an employee. This is permissible, but some record of the employee's transfer and continued employment should be documented.)	✓	
d.	Does the generator provide a training program that teaches personnel to perform their duties in ways that ensures the generator's compliance with WAC 173-303 (WAC -330(1))?	✓	
e.	Does the training program involve:		
	Classroom instruction?	✓	
	On-the-job training?	✓	
f.	Is the training program directed by a person knowledgeable in dangerous waste handling practices (WAC -330(1)(a))?	✓	

		Yes	No
g.	Do the generator's employees participate in an annual review of the training provided in the training program (WAC -330(1)(b))?	✓	
h.	Is the training program successfully completed by each employee within six months of being employed at the generator's site, or of being assigned to a new position, whichever is later (WAC -330(1)(c))?	✓	
i.	Are new employees supervised until they complete the training program (WAC -330(1)(c))?	✓	
j.	Does the training program:		
	i. Include training relevant to the positions in which personnel are employed (WAC -330(1)(a))?	✓	
	ii. Instruct personnel on contingency plan implementation (WAC -330(1))?	✓	
	iii. Familiarize personnel with emergency equipment and systems, and emergency procedures (WAC -330(1)(d))?	✓	
k.	Where applicable, does the training program include the following parameters (WAC -330(1)(d))?		
	i. Procedures for using, inspecting, repairing and replacing emergency and monitoring equipment.	✓	
	ii. Key parameters for automatic waste feed cut-off systems.	✓	
	iii. Communications or alarm systems.	✓	
	iv. Response to fires or explosions.	✓	
	v. Response to ground water contamination.	✓	
	vi. Shutdown of operations.	✓	

Comments: _____

D. Preparedness and Prevention (WAC -340).	Yes	No
a. Is each container and tank used for accumulation labeled or marked with the words "Dangerous Waste" or "Hazardous Waste," and with a label or sign which identifies for employees, emergency response personnel and the public the major risk(s) associated with the waste in the container or tank (WAC -200(1)(d))?	✓	
b. Unless it can be demonstrated that the equipment is not necessary (specify why not in the Comments, below), or the equipment is not required because wastes are held less than ten days (as allowed by WAC -200(1)(e)), are the following equipment present, tested regularly, and kept in good working order:		
i. Internal communications or alarm system capable of providing immediate emergency instructions (WAC -340(1)(a))?		
Present?	✓	
Tested regularly?	✓	
Good working order?	✓	
ii. A device capable of summoning police or fire departments or emergency response teams (e.g., telephone, two-way radio) (WAC -340(1)(b))?		
Present?	✓	
Tested regularly?	✓	
Good working order?	✓	
iii. Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment (WAC -340(1)(c))?		
Present?	✓	
Tested regularly?	✓	
Good working order?	✓	
iv. Water at adequate volume/pressure to supply hose streams, foam equipment, sprinklers or spray systems (WAC -340(1)(d))?		
Present?	✓	
Tested regularly?	✓	
Good working order?	✓	
c. Whenever dangerous waste is being handled, do all personnel involved have immediate access to an internal alarm or emergency communication system, either directly or through visual or voice contact with another employee (WAC -340(2)(a))?	✓	

		Yes	No
d.	If there is ever just one employee present on the premises, does he have immediate access to a device (e.g., telephone, two-way radio) capable of summoning external emergency help (WAC -340(2)(b))?	✓	
e.	Is adequate aisle space provided to allow for inspections and unobstructed movement of personnel, fire and spill control equipment and decontamination equipment during an emergency (WAC -340(3))?	✓	
f.	Do the hazards posed by the wastes handled by the generator require arrangements with local authorities? (If "Yes," complete the remaining questions, g. through k, below. If "No," document under Comments, below, why the hazards are not such as to warrant these arrangements.)	✓	
g.	Has the generator arranged to familiarize police, fire departments and emergency response teams with: the layout of his site; properties of wastes handled and associated hazards; places where personnel would normally be working; entrances to and roads on the site; and possible evacuation routes (WAC -340(4)(a))?	✓	
h.	Has the generator arranged to familiarize local hospitals with the properties of dangerous wastes handled and the types of injuries or illnesses which could result from fires, explosions or waste releases (WAC -340(4)(b))?	✓	
i.	Does the generator have agreements with state emergency response teams, emergency response contractors and equipment suppliers (WAC -340(4)(c))?	✓	
j.	Where more than one party might respond to an emergency, does the generator have agreements designating primary emergency authority and support services to be provided (WAC -340(4)(d))?	✓	
k.	Has the generator documented all instances where state or local authorities have declined to enter into the above arrangements (WAC -340(5))?	✓	

Comments _____

E. Contingency Plan, Emergency Procedures and Emergencies (WAC -350 and -360)	Yes	No
a. Does the generator have a contingency plan designed to lessen the potential impacts of a fire, explosion or unplanned sudden or nonsudden release of dangerous wastes or dangerous waste constituents to air, soil, surface or ground water (WAC -350(1))?	✓	
b. Does the generator have a Spill Prevention Control and Countermeasures (SPCC) plan amended to include a contingency plan (WAC -350(2))?	✓	
c. Are copies of the contingency plan and revisions to it:		
i. Maintained at the generator's site (WAC -350(4)(a))?	✓	
ii. Submitted to all local police departments, fire departments, and hospitals, and state and local emergency response teams that may provide emergency services (WAC -350(4)(b))?	✓	
d. Is the contingency plan amended whenever:		
i. Applicable regulations are revised (WAC -350(5)(a))?	✓	
ii. The plan fails in an emergency (WAC -350(5)(b))?	✓	
iii. The generator's site changes in a way that increases the potential for fires, explosions, or releases, or that changes the necessary emergency responses (WAC -350(5)(c))?	✓	
iv. The list of emergency coordinators changes (WAC -350(5)(d))?	✓	
v. The list of emergency equipment changes (WAC -350(5)(e))?	✓	
e. Does the contingency plan include:		
i. A description of the actions personnel must take in the event of an emergency circumstance (WAC -350(3)(a))?	✓	
ii. A description of the arrangements agreed to by local police and fire departments, hospitals, contractors, and state and local response teams to coordinate emergency services (WAC -350(3)(c))?	✓	

		Yes	No
iii.	A current list of emergency coordinators, including names, addresses and twenty-four hour phone numbers (WAC -350(3)(d))?	✓	
iv.	If more than one emergency coordinator is listed, identification of a primary emergency coordinator, with the others listed in the order that they will assume responsibility as alternates (WAC -350(3)(d))?	✓	
v.	A list of all emergency equipment kept on the site, including the location, physical description and brief outline of the capability of each piece of equipment (WAC -350(3)(e))?	✓	
vi.	An evacuation plan (where evacuation could be necessary) for personnel, which describes signals to begin evacuation, evacuation routes, and alternate routes (WAC -350(3)(f))?	✓	
f.	Do the information and elements described in the contingency plan assure that the generator has taken adequate precautions for reacting to emergency circumstances? (If "No," specify what inadequacies exist in the Comments section, below.)	✓	
g.	Is an emergency coordinator on the premises at all times or available on-call at all times (WAC -360(1))?	✓	
h.	Is the emergency coordinator (and his alternates, if any) capable in the following areas (WAC -360(1)):		
i.	Familiar with all aspects of the contingency plan?	✓	
ii.	Familiar with all operations and activities on the generator's site?	✓	
iii.	Familiar with the location and properties of all wastes handled?	✓	
iv.	Familiar with the location of all records kept on-site?	✓	
v.	Familiar with the generator's site layout?	✓	
vi.	Has the authority to commit the resources needed to carry out the contingency plan?	✓	

		Yes	No
i.	Are the following procedures implemented (or, to be implemented) in the event of an emergency:		
	i. Does the emergency coordinator or his designee (EC/D) immediately activate internal alarms or communication systems to notify all personnel (WAC -360(2)(a)(i)) and notify appropriate state or local agencies with designated response roles if help is needed (WAC -360(2)(a)(ii))?	✓	
	ii. Does the EC/D immediately identify the character, exact source, amount and areal extent of any released materials (WAC -360(2)(b))?	✓	
	iii. Concurrently, does the EC/D assess possible hazards to human health and the environment (including direct, indirect, immediate and long-term effects) that may result from the emergency (WAC -360(2)(c))?	✓	
	iv. If the EC/D determines that the emergency could threaten human health or the environment outside the facility, does he immediately notify and provide an assessment report (which must include the information described under v., below) to:		
	1. The appropriate local authorities if evacuation of local areas may be advisable; and remain available to help appropriate officials decide if local areas should be evacuated (WAC -360(2)(d)(i))?	✓	
	2. WDOE and either the government official designated as on-the-scene coordinator, or the National Response Center (WAC -360(2)(d)(ii)?	✓	
	v. Does the assessment report (covered under iv., above) include:		
	1. Name and telephone number of reporter (WAC -360(2)(e)(i))?	✓	
	2. Name and address of the generator's site (WAC -360(2)(e)(ii))?	✓	
	3. Time and type of emergency (e.g., fire, release) (WAC -360(2)(e)(iii))?	✓	
	4. Name and quantity of materials involved (WAC -360(2)(e)(iv))?	✓	

	Yes	No
5. The extent of injuries, if any (WAC -360(2)(e)(v))?	✓	
6. Possible hazards to human health and the environment off the site (WAC -360(2)(e)(vi))?	✓	
vi. During an emergency, does the EC/D take all measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other dangerous wastes (e.g., stopping processes or operations, collecting and containing releases, removing or isolating containers, etc.) (WAC -360(2)(f))?	✓	
vii. If operations stop in response to an emergency, does the EC/D monitor for leaks, pressure buildup, gas generation or ruptures wherever appropriate (WAC -360(2)(g))?	✓	
viii. Immediately after an emergency, does the EC/D provide for treating, storing or disposing wastes and materials resulting from the emergency (WAC -360(2)(h))?	✓	
ix. Does the EC/D ensure, in the affected areas on the site, that:		
1. No waste that may be incompatible with the released material is treated, stored or disposed until cleanup procedures are completed (WAC -360(2)(i)(i))?	✓	
2. All emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations resume (WAC -360(2)(i)(ii))?	✓	
x. Does the generator notify WDOE, and appropriate local authorities, that his site satisfies the conditions described under ix.1. and 2., above, before operations resume in the affected areas of his site (WAC -360(2)(j))?	✓	
xi. Does the generator note in his operating record the time, date, and details of incidents requiring implementation of the contingency plan (WAC -360(2)(k))?	✓	
xii. Within fifteen days after the emergency, does the generator submit a written report of the incident to WDOE which includes:	✓	

		Yes	No
1.	Name, address, and telephone number of the generator (WAC -360(2)(k)(i)) and of the site (WAC -360(2)(k)(ii))?	✓	
2.	Date, time, and type of emergency (WAC -360(2)(k)(iii))?	✓	
3.	Name and quantity of materials involved (WAC -360(2)(k)(iv))?	✓	
4.	The extent of injuries, if any (WAC -360(2)(k)(v))?	✓	
5.	An assessment of actual or potential hazards to human health or the environment, where this is applicable (WAC -360(2)(k)(vi))?	✓	
6.	Estimated quantity and disposition of recovered material that resulted from the incident (WAC -360(2)(k)(vii))?	✓	

Comments The facility works with Chemical Processors, Inc's Regulatory Affairs Department to evaluate all spills as to why/when/what information to those agencies required to receive reports by the regulations.

13. METHOD OF ACCUMULATION	Yes	No
How does the generator accumulate his dangerous wastes:		
A. In containers? (Complete Section 14., below.)	✓	
B. In tanks? (Complete Section 15., below.)	✓	

C. In piles (Note: This option is only available for moderate risk wastes)? (Complete Section 16., below.) — No

14. ADDITIONAL REQUIREMENTS FOR GENERATORS ACCUMULATING WASTES IN CONTAINERS.

	Yes	No
A. Are all containers in good condition, and are dangerous wastes transferred to good containers or otherwise managed if the original container leaks (WAC -630(2))?	✓	
B. Are all containers marked with the date accumulation began (WAC -200(1)(c))?	✓	
C. Are all containers made of or lined with materials that will not react or are otherwise compatible with the wastes being accumulated (WAC -630(4))? (If necessary, request and obtain documentation to demonstrate waste/container compatibility.)	✓	
D. Are all containers used for accumulating dangerous wastes:		
a. Always closed except when wastes are added or removed (WAC -630(5)(a))?	✓	
b. Not opened, handled, or stored (e.g., left in areas of heavy traffic where collisions could occur, or personnel or the public could intentionally or accidentally damage the containers) in ways that would rupture the containers or cause them to leak (WAC -630(5)(b))?	✓	
c. Stored in a manner which allows the generator to inspect each container for leaks, ruptures or deterioration?	✓	
E. Does the generator inspect at least weekly the areas where containers are used to accumulate wastes, looking for leaking containers and for deterioration from corrosion and other factors (WAC -630(6))?	✓	
F. Does the generator keep records of weekly inspections of his container storage area which describe (WAC -630(6)):		
a. The dates of inspection and name(s) of inspector(s)?	✓	
b. Observations of any leaks or container deterioration detected?	✓	
c. Measures taken to correct leaks or deteriorated containers (if any)?	✓	

G. Are containers used for accumulating ignitable or reactive dangerous waste? ___ ✓

If "Yes":

a. Are containers holding reactive wastes (if any) capable of detonation or explosion, or that are forbidden explosives or Class A or B explosives (49 CFR 173.51, 53 or 88) stored equivalent to UFC's "American Table of Distances for Storage of Explosives," Table 77-201 (WAC -630(8)(a))? ___ ___

b. Are all other ignitable or reactive waste container storage designed, operated and maintained equivalent to the Uniform Fire Code, state or local fire codes, or NFPA Pamphlet #30, "Flammable and Combustible Liquids Code" (WAC -630(8)(b))? ___ ___

c. Are those areas where ignitable or reactive wastes are accumulated inspected at least yearly by a professional person familiar with the Uniform Fire Code, or by a federal, state, or local fire marshal (WAC -630(8)(b), -395(1)(d))? ___ ___

d. Does the generator keep records of these fire inspections which describe:

i. The dates of inspection and name(s) of inspector(s)? ___ ___

ii. Observations of any unsafe or improper ignitable or reactive waste handling? ___ ___

iii. Measures taken to correct any unsafe or improper ignitable or reactive waste handling? ___ ___

H. Are incompatible wastes or incompatible wastes and materials accumulated or held on-site (e.g., corrosives with ignitables, chlorinateds with ignitables)? ___ ✓

If "Yes":

a. Describe which wastes or wastes and materials are incompatible:

_____

_____

_____

_____

_____

		Yes	No
b.	Does the generator assure that dangerous wastes are not put in containers which previously held incompatible wastes or materials unless the container has been washed (WAC -630(9)(b))?	✓	
c.	Are containers holding waste that is incompatible with wastes or materials stored nearby separated or protected from such wastes or materials by a dike, berm, wall or other device, and are containment systems (if any) for incompatible wastes separate (WAC -630(9)(c))?	N/A	
d.	Are incompatible wastes, or incompatible wastes and materials put in the same container?	N/A	

Describe which incompatible wastes or wastes and materials are involved:

_____

_____

_____

_____

_____

		Yes	No
e.	If incompatible wastes or wastes and materials are mixed or commingled, are these activities conducted so as <u>not</u> to (WAC -630(9)(a)):		
i.	Generate extreme heat, pressure, fire, explosion or violent reaction (WAC -395(1)(b)(i))?		
ii.	Produce uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health or the environment (WAC -395(1)(b)(ii))?		
iii.	Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions (WAC -395(1)(b)(iii))?		
iv.	Damage the structural integrity of the facility or containers (WAC -395(1)(b)(iv))?		
v.	Otherwise threaten human health or the environment (WAC -395(1)(b)(v))?		

Note: If the generator is treating wastes as they are placed in his containers (other than simple mixing with an absorbent), he may be operating a dangerous waste treatment facility.

I. SECONDARY CONTAINMENT (WAC -200(7))

	Yes	No
For new container accumulation areas constructed after September 30, 1986 or for persons who have been required to do so by WDOE on a case-by-case basis, have the following containment standards been met?		
i. Is the containment system capable of collecting and holding spills and leaks? (WAC -630(7)(a))		
ii. If the storage area is uncovered, is the containment system capable of holding the additional volume that would result from the precipitation of a maximum 25 year storm of 24 hours duration? (WAC -630(7)(a))		
iii. Does the containment system have an underlying base which is free of cracks or gaps and is sufficiently impervious to contain leaks, spills and accumulated rainfall until the collected material is detected and removed? (WAC -630(7)(a))		
iv. Is the base sloped or the containment system otherwise designed and operated to drain and remove liquids from leaks, spills, or precipitation, unless the containers are elevated or otherwise protected from contact with accumulated liquids? (WAC -630(7)(a)(i))		
v. Is the system designed for positive drainage control (such as a locked drainage valve) to prevent release of contaminated liquids and so that contaminated precipitation can be drained promptly for convenience of operation? (WAC -630(7)(a)(ii))		
vi. Is spilled or leaked waste and accumulated precipitation removed in as timely a manner as necessary to prevent overflow? (WAC -630(7)(a)(ii))		
vii. Does the containment system have sufficient capacity to contain 10 percent of the volume of all containers or the volume of the largest container (holding free liquids or dioxin wastes), whichever is greater? (WAC -630(7)(a)(iii))		
viii. Is the run-on into the containment system prevented? (WAC -630(7)(b))		
If no, has WDOE waived this requirement? (WAC -630(7)(b))		
ix. Are EHW in containers protected from the elements by means of a building or other protective covering that otherwise allows adequate inspection? (WAC -630(7)(d))		

x. For storage areas that store containers holding only wastes that do not contain free liquids, do not exhibit either the characteristic of ignitability or reactivity, and are not listed as F020, F021, F022, F023, F026 or F027, instead of the containment requirements described above, only the following two requirements need apply (WAC -630(7)(c)):

	Yes	No
o Is the storage area sloped or otherwise designed and operated to drain and remove liquids resulting from precipitation; or	/	
o Are the containers elevated or otherwise protected from contact with accumulated liquids?		

Comments Containers are used for the oily sludge from tank cleaning.

15. ADDITIONAL REQUIREMENTS FOR GENERATORS ACCUMULATING WASTES IN TANKS.

	Yes	No
A. Does the generator maintain a system of records which assure that no wastes held in his tanks are being accumulated for more than ninety days (one hundred eighty days for moderate risk wastes or generators of less than 2200 pounds per month of dangerous wastes)?	Storage facility N/A	
B. Are wastes or other materials which are incompatible with the material of construction of the tanks ever placed in the tanks?		No
If "Yes," is the tank protected from corrosion, erosion or abrasion through use of:		
a. An inner liner, free of leaks, cracks, holes or other deterioration, which is compatible with the waste or materials (WAC -640(3)(a)(i)?		

b. Alternative protection (e.g., cathodic protection, corrosion inhibitors) (WAC -640(3)(a)(ii))? — —

	Yes	No
C. Does the generator use appropriate measures to prevent overfilling and overtopping, including:		
a. Controls to prevent overfilling (e.g., waste feed cut-off systems, by-pass to a standby tank) (WAC -640(3)(b)(i))?	✓	
b. For uncovered tanks, maintenance of at least two feet of freeboard (WAC -200 (1)(b), -640(3)(b)(ii))?	✓	
D. Does the generator inspect at least <u>once each operating day</u>:		
a. Overfilling control equipment to ensure it is in good working order (WAC -640(4)(a)(i))?	✓	
b. Data gathered from monitoring equipment where present, to ensure each tank is operated according to its design (WAC -640(4)(a)(ii))?	✓	
c. For uncovered tanks, the level of waste in each tank to ensure the freeboard is at least two feet (WAC -640(4)(a)(iii))?	✓	
E. Does the generator inspect at least <u>weekly</u>:		
a. The construction materials of the above ground portions of each tank to detect corrosion, erosion or leaking of the tank, fixtures and seams (WAC -640(4)(a)(iv))?	✓	
b. The area immediately surrounding each tank to detect obvious signs of leakage (e.g., wet spots, dead vegetation) WAC -640(4)(a)(v))?	✓	
F. Does the generator have a written schedule for inspecting his tanks which includes records describing (WAC -640(4)(b)):		
a. The dates of inspections and name(s) of inspector(s)?	✓	
b. Observations of any conditions which could cause the tank to leak or fail as specified in the written schedule?	✓	
c. Measures taken to correct or prevent any hazardous conditions identified during the inspection?	✓	
G. Does the generator have records describing dates that spills or leaks (if any) from his tanks occurred and measures taken to clean up and decontaminate the spills or leaks (WAC -640(4)(c))? (Note: The measures to be		

taken to respond to spills or leaks should be described in his contingency plan.)

H. Does the generator have records showing that at least <u>once each operating day</u> he:

	Yes	No
a. Gathered data from monitoring equipment to ensure the tank was operated according to its design (WAC -640(4)(a)(ii))?	✓	
b. Checked the level of waste in uncovered tanks (if any) to ensure that a minimum freeboard of two feet was maintained (WAC -640(4)(a)(iii), -200(1)(b))?	✓	
I. Have any tanks been closed and removed from dangerous waste service since the last inspection?		✓
If "Yes":		
a. Have all dangerous wastes and residues been removed from the tanks, discharge control equipment, containment systems and bases (where present) and discharge confinement structures (WAC -640(5))?		✓
b. Have all tanks, bases, liners and soils containing or contaminated with dangerous wastes or residues been removed or decontaminated (WAC -640(5))?		
J. Are ignitable or reactive wastes placed in tanks?		✓
If "Yes":		
a. Is the tank only used for emergencies (WAC -640(6)(a)(iii))?		
b. Is the waste stored in such a way that it is protected from any material or conditions that may cause the waste to ignite or react (WAC -640(6)(a)(ii))?		
c. Is the waste treated, rendered or mixed before or immediately after placement in the tank so that (WAC -640(6)(a)(i)):		
i. The resulting mixture in the tank is no longer ignitable or reactive under WAC -090?		
ii. And, the mixing or commingling of the waste does not: generate extreme heat, pressure, fire, explosion or violent reaction; produce uncontrolled toxic mists, fumes, dusts or gases that threaten human health or the environment; produce uncontrolled flammable fumes or gases that pose a risk of fire or		

explosion; damage the structural integrity of the tank or equipment; otherwise threaten human health or the environment (WAC -395(1)(b))?

Note: If the generator is treating wastes as they are placed in his tanks, he may be operating a dangerous waste treatment facility.

d. Are the tanks located in a manner equivalent to the NFPA's buffer zone requirements for tanks (Tables 2-1 through 2-6 of the NFPA-30 "Flammable and Combustible Liquids Code - 1981"), or as required by state and local fire codes if these are more stringent (WAC -640(6)(b))?

e. At least yearly, is the tank storage area inspected by a professional person knowledgeable in the Uniform Fire Code, or by a local, state or federal fire marshal (WAC -640(6)(b), - 395(1)(d))?

f. Does the generator keep records of this annual inspection describing:

   i. The dates of inspection and name(s) of inspector(s)?

   ii. Observations of any unsafe or improper ignitable or reactive waste handling?

   iii. Measures taken to correct any unsafe or improper ignitable or reactive waste handling?

K. Are incompatible wastes or incompatible wastes and materials placed in the same tank?

If "Yes":

a. Describe which wastes or wastes and materials are incompatible:

_____

_____

_____

_____

_____

b. If incompatible wastes or wastes and materials are placed in the same tank, or if dangerous waste is placed in an unwashed tank which previously held

incompatible waste or materials, are these activities conducted so as not to (WAC -640(7)):

i. Generate extreme heat, pressure, fire, explosion or violent reaction (WAC -395(1)(b)(i))? ___ ___

ii. Produce uncontrolled toxic mists, fumes, dusts or gases that threaten human health or the environment (WAC -395(1)(b)(ii))? ___ ___

iii. Produce uncontrolled flammable fumes or gases that pose a risk of fire or explosion (WAC -395(1)(b)(iii))? ___ ___

iv. Damage the structural integrity of the tank or equipment (WAC -395(1)(b)(iv))? ___ ___

v. Otherwise threaten human health or the environment (WAC -395(1)(b)(v))? ___ ___

Note: If the generator is treating incompatible wastes as they are placed in his tanks, he may be operating a dangerous waste treatment facility.

Comments _____

16. ADDITIONAL REQUIREMENTS FOR GENERATORS ACCUMULATING WASTES IN PILES.

Yes No

Note: This section is applicable to only those moderate risk wastes a generator may be accumulating.

No Piles

A. Does the generator keep records of any leaks of liquids into the leak detection system that have occurred, describing (WAC -660(3)(b)):

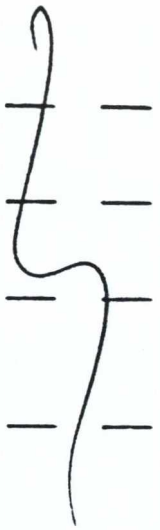
a. Dates and times leaks were detected?

b. Measures taken to remove accumulated liquids and stop leakage that is occurring?

c. Certification by a qualified engineer that the leak has been stopped?

B. Does the generator keep records of any notifications sent to WDOE that there have been leaks into the leak detection system (if any?)

C. [Remainder to be added at a later date.]



DANGEROUS WASTE COMPLIANCE CHECKLIST/QUESTIONNAIRE, CHAPTER 173-303 WAC
March 1987

* *

PART IV: GENERAL TSD FACILITY REQUIREMENTS

This part of the checklist/questionnaire applies to all facilities which treat, store, or dispose (TSD) dangerous waste, including interim status and final status facilities, and permit-by-rule and emergency permit facilities (except that in such cases, only some of this part of the checklist/questionnaire may be applicable). This part of the checklist/questionnaire covers those facility requirements which apply to all TSD facilities regardless of the specific type of unit operations (e.g., containers, tanks, incinerators). Other parts of this checklist/questionnaire address the specific unit operating requirements for interim and final status facilities, and should be used in conjunction with this more general part. The abbreviation "O/O" is used frequently throughout the TSD facility parts of this checklist/questionnaire and stands for the words "owner and/or operator."

* *

1. MODERATE RISK WASTE MANAGEMENT. — Yes / No

Does the facility manage any moderate risk wastes (MRW) for which the O/O has sought and obtained from WDOE reduction in the regulatory requirements applicable to such MRW (such reductions must be specified either in the facility permit issued under WAC -806, or else in a notice of interim status modification issued under WAC -805(9))? — Yes ___ No ✓

If not, then all sections of this Part IV of the checklist/questionnaire are applicable. If yes, then some sections of this Part IV may not be applicable to such MRW management. Notes should be made in the appropriate Comments area where there may be discrepancies between the requirements on MRW and on any other dangerous wastes managed at the facility (e.g., fire control equipment may be checked as present and in good operating condition except for MRW, with a note under comments that such equipment was not present in the MRW management areas because it is not necessary).

2. RECYCLING FACILITIES — Yes / No

A. General

Does this facility recycle any dangerous waste? — Yes ___ No ✓

If no, skip this section (2) and continue with Section 3.

If yes, the recyclable material may fall into one of three categories:

- o It may be "exempt" under WAC 173-303-016, -017, -071, or -120(2); or
- o It may be subject to special standards under

173-303-500 through 173-303-525; or

- o Where no special standards exist, any storage prior to recycling is fully regulated either under the usual generator accumulation or facility storage provisions, while the recycling process itself is not regulated. (WAC -120(4))

The remainder of this section identifies those recycling practices for which special standards exist. REMINDER: These special standards apply to the recycling of dangerous wastes. Certain recycling practices do not involve wastes at all.

B. Immediate Recycler

	Yes	No
Does the recycler accept dangerous wastes from off-site and recycle them immediately, without any prior storage?		✓
If yes, the O/O need only comply with the following two requirements.		
a. Does the O/O have an ID#? (WAC -120(4)(c)(i))	✓	
b. Does the recycler comply with the manifest requirements of WAC 173-303-370? (WAC -120(4)(c)(iii))	✓	

Complete Section 5 of this Part (IV) of the checklist to determine this.

COMMENTS The facility stores waste oil to treat it to become usable as a cutting stock for marine fuels.

C. STATE-ONLY

	Yes	No
Does the recycler receive state-only dangerous waste from off-site and store this waste for less than 90 days in containers or tanks prior to recycling?		✓
If so, instead of the full storage permit requirements, the recycler need only satisfy the following:		
a. Does the O/O have an ID# (WAC -500(2)(c)(i))	✓	
b. Does the o.o comply with the manifest requirements of WAC -370? (WAC -500(2)(c)(ii))	✓	

Complete section 5 of this Part (IV) of the checklist to determine this.

c. Does the O/O comply with the requirements of WAC 173-303-330 through 173-303-360, concerning personnel training, preparedness and prevention, contingency plans, and emergencies? (WAC -500(2)(c)(iii)(A)) ✓ —

To determine this, complete sections 8, 9 and 10 of this Part (IV) of the checklist.

d. If the waste is stored in containers, does the O/O comply with WAC 173-303-630(2),(3),(4),(5),(6),(8) and (9), the container storage standards? (WAC -500(2)(c)(iii)(B)) ✓ —

To determine this, complete Part II, Section 13, Items A - H of the checklist.

e. If the waste is stored in tanks, does the O/O comply with WAC 173-303-640(3),(4),(5),(6) and (7), the tank storage standards? (WAC -500(2)(c)(iii)(C)) ✓ —

To determine this, complete Part II, Section 14 of the checklist.

f. If the container area was constructed after Sept. 30, 1986, does the O/O comply with WAC 173-303-630(7), secondary containment? (WAC -500(2)(c)(iii)(D)) N/A

To determine this complete Part II, Section 13, Item I of the checklist.

Has not constructed such a unit ~~since~~ after Sept 30, 1986.

g. For new tanks installed after September 30, 1986, have the additional following requirements been met? (WAC -500(2)(c)(iii)(C)) — —

i. Are the tanks (including foundation, structural support, seams and pressure controls) designed to assure that they will not collapse or rupture, by providing sufficient shell strength, pressure controls for closed tanks, earthquake resistence, etc.? — —

ii. Has the O/O submitted a statement certified by a licensed professional engineer specifying the basis for selecting minimum shell thickness (such as Underwriters Laboratories, American Petroleum Institute, American Concrete Institute, or American Society of Mechanical Engineers standards)? (WAC -640(2)(a)) — —

iii. For tanks installed after _____:

Are they build above ground? (WAC -640(2)(b))

Do they have a containment system which includes an impervious base underlying the tanks in the storage area, unless state or local fire codes require otherwise? (WAC -640(2)(b))

Does the containment system have adequate capacity to contain one hundred ten percent of the volume of the largest tank in the storage area? (WAC -640(2)(b))

For uncovered tanks, is the capacity of the containment system sufficient to also hold the precipitation of a maximum 25 year storm of 24 hour duration? (WAC -640(2)(b))

iv. Are all tanks holding EHW which is acutely or chronically toxic by inhalation designed to prevent escape of vapors, fumes, or other emissions into the air? (WAC -640(2)(d))

h. If the recycler is not able to recycle within 90 days or is storing in units other than containers or tanks, has he sought and obtained from WDOE reduction in the regulatory requirements applicable to such state-only wastes being recycled? (WAC -805(9)) (Such reductions must be specified either in the facility permit issued under WAC -806, or in a notice of interim status modification issued under WAC -805(9)

COMMENTS: The facility has not added any new tanks / containers areas d

D. USE CONSTITUTING DISPOSAL (WAC -505)

	Yes	No
a. Does the O/O store wastes that will be reycled by being applied to or placed on the land (i.e., used in a manner constituting disposal)?		✓

If yes, full storage requirements apply prior to the time at which the waste becomes a product. Complete the checklist as it applies to storage facilities.

Full land disposal requirements may also apply to the use of the recyclable material unless the product is exempt. There are two possible exemptions.

b. Exemption 1

i. Does this product contain recyclable materials? ___ ✓

ii. Is the product produced for the general public's use in a manner constituting disposal? ___ ✓

iii. Have the recyclable materials undergone a chemical reaction in the course of producing the product so as to become inseparable by physical means? ___ ___

If the answer to all three of these questions is yes, the product itself is exempt and therefore the land disposal requirements do not apply.

If the answer to any one of these questions is no, the product itself is regulated. Applying a dangerous waste to the land constitutes land disposal. Complete the remainder of the checklist applicable to land disposal units.

c. Exemption 2

i. Is the product a commercial fertilizer that contains a recylable material? ___ ✓

ii. Is the fertilizer produced for the general public's use? ___ ___

If the answer to both of these questions is yes, the product itself is exempt and therefore the land disposal requirements do not apply.

If the answer to either one of these questions is no, the product itself is regulated. Applying a dangerous waste to the land constitutes land disposal. Complete the remainder of the checklist applicable to land disposal units.

COMMENTS: The materials are oily Sludges that are sent to CSSI for disposal. Arlington, Oregon.

E. BURNING DANGEROUS WASTE FOR ENERGY RECOVERY

	Yes	No
a. Does the O/O burn dangerous waste for energy recovery?		
b. Is the dangerous waste burned for energy recovery in an industrial furnace as defined in WAC -040(43) or a boiler as defined in WAC -040(8)? (WAC -510(2)(b))		
c. If the burning device is a cement kiln, is it located within the boundaries of any incorporated municipality with a population greater than 500,000? (WAC -510(2)(c))		
If yes, the incinerator standards apply. Complete all remaining applicable portions of the checklist.		
d. Has the burner notified WDOE under -60 and identified his waste-as-fuel activities? (WAC -510(6)(b))		
e. Does the burner have records to show that before receiving dangerous waste fuel from a marketer, he provided to each marketer a notice stating that:		
i. he will burn the dangerous waste fuel only in an industrial furnace of boiler, and		
ii. he has notified WDOE of his activities, stating the location and general description of his waste-as-fuel activities? (WAC -510(6)(d))		
f. In addition to the applicable recordkeeping requirements of -380, does the burner also keep copies of all invoices, analyses and certifications to marketers for at least three years? (WAC -515(5)(e))		

In addition to the above requirements, burners must comply with applicable generator accumulation or facility storage requirements, for storage of the waste prior to burning. Complete any applicable portions of the checklist.

F. USED OIL

	Yes	No
a. If the O/O burns oil that meets the specifications, does he maintain records of test results (or other information) to document that the used oil meets all of the specifications in Table 1 of WAC -515(1)? (WAC -515(5)(d)(ii))		

Not done at facility

If yes, the following used oil requirements do not apply.

b. Does the O/O burn off-specification used oil for energy recovery?

If so, complete the rest of section F.

c. Is the off-specification used oil burned in a boiler as defined in WAC 173-303-040(8) or industrial furnace as defined in WAC -040(43)? (WAC 515(2)(b))

d. Does the burner ever burn used oil which:
   i. is EHW through the criteria, or
   ii. contains a listed waste (other than a SQG's listed waste), or
   iii. contains over 1000 ppm total halogens (unless proven not to contain a listed waste using the rebuttable presumption)? (WAC -515(1))

e. Has the burner notified WDOE of his used oil management activities (WAC -515(5)(b))?

f. Does the burner have records to show that before receiving off-specification used oil from a marketer, he provided to each marketer a notice stating that:

   i. he will burn the used oil only in an industrial furnace or boiler, and

   ii. he has notified WDOE of his activities, stating the location and general description of such used oil activities? (WAC -515(5)(c))

   (The notice need only be provided once, but must be provided to each marketer from which off-specification used oil is accepted.)

g. Does the burner keep copies of all invoices, analyses and certifications to marketers for at least three years? (WAC -515(5)(e))

h. Is the burner in compliance with the air emission requirements of the local air pollution control authority (or Ecology if no local authority with jurisdiction exists)? (WAC -515(5)(f))

COMMENTS: The facility recovers oil from oily wastes to

G. SPENT LEAD-ACID BATTERIES

Yes No

Does this person store spent lead-acid batteries without performing any portion of the reclamation activity? (i.e., cracking, draining, etc.)

Does not Process Lead-Acid Batteries.

If yes, the O/O is exempt from the storage requirements for these wastes (WAC -520(1)).

If reclamation is occuring, the O/O must comply with most of the storage permit requirements, with the exception of waste analyses, manifesting, and recordkeeping of unmanifested waste reports (WAC -520(2)). Complete the remainder of the checklist for storage facilities, except that the following sections are not applicable:
Part IV Sections 5, 6, and 14A.

COMMENTS: _____

_____

_____

_____

H. PRECIOUS METALS

Yes No

a. Does the O/O recovery economically significant amounts of gold, silver, platinum, paladium, irridium, osmium, rhodium, ruthenium, or any combination of these metals? ___ ✓

If yes, only the next four questions apply.

i. Does the O/O have an ID#? (WAC -525(1)(b)(i)) ___ ___

ii. Does the O/O comply with the manifest requirements of WAC 173-303-370? (WAC -525(1)(b)(ii))? ___ ___

Complete Section 5 of this Part IV of the checklist to determine this.

iii. Does the O/O keep records to show:

the volume of precious metals generated or received during the calendar year? (WAC -525(1)(c)(i)) ___ ___

the amount of precious metals generated or received during the calendar year? (WAC -525(1)(c)(ii)) ___ ___

the amount of precious metals remaining at the end of the calendar year? (WAC -525(1)(c)(iii))

iv. Do the above records show that the precious metals are being accumulated speculatively, i.e., there is less than 75% turnover in a given year?

If not accumulated speculatively, additional requirements do not apply.

If accumulated speculatively, full storage requirements apply prior to the actual recycling (WAC -525(1)(d)). Complete all remaining applicable portions of the checklist (i.e., storage requirements).

v. Has WDOE determined on a case-by-case basis that persons accumulating or storing precious metals for recovery should be fully regulated under WAC 173-303-120, rather than the above special standards? (WAC -525(2))

If so, the recycler must comply with the full generator accumulation or facility storage requirements.

COMMENTS: Does not process precious metals at facility.

3. FACILITY SITING (WAC -420). Yes No

A. Earthquake Fault Criteria (WAC -420(3)).

a. Is the facility located in any one of the following counties (WAC -420(3)(c))? (If "No," the facility is automatically in compliance with the earthquake fault criteria and no further questions need to be asked.) ✓

Chelan	Grays Harbor	Mason	Skamania
Clallam	Jefferson	Okanogan	Snohomish
Clark	King	Pacific	Thurston
Cowlitz	Kitsap	Pierce	Wahkiakum
Douglas	Kittitas	San Juan	Whatcom
Ferry	Lewis	Skagit	Yakima
Grant			

b. Is the facility located within 200 feet of a fault which has had displacement in Holocene times (WAC -420(3)(a))? ✓

Note: Existing facilities (i.e., operating prior to November 19, 1980 for EPA wastes and prior to August 9, 1982 for state-only wastes) may be located within 200 feet of such faults. New facilities may not.

c. If the facility manages only moderate risk wastes, and is a new facility located within 200 feet of a fault, is the facility engineered against earthquakes and has WDOE approved the engineering (WAC -420(3)(a))? —

B. Floodplain Criteria (WAC -420(4)).

a. Is the facility located in a one hundred year floodplain (WAC -420(4)(a))? (If "No," then the facility is automatically in compliance with the floodplain criteria and no further questions need to be asked.) ✓

b. Is the facility designed, constructed, operated, and maintained to prevent washout of any dangerous waste by a one hundred year flood (WAC -420(4)(a) and (b))? (Describe the washout precautions under Comments, below.)

c. If the facility manages DW only and never manages EHW, in lieu of washout precautions has the facility O/O included in his contingency plan procedures for safely removing the DW, before floodwaters reach the facility, to another facility that is not vulnerable to floodwaters (WAC -420(4)(a))? (If "Yes," these provisions will be addressed in the Contingency Plan section, below.)

C. Shoreline Criteria (WAC -420(5)).

a. Is the facility disposing of dangerous waste in an area defined as a "wetland" under RCW 90.58.030 (2)(f). ("Wetlands" or "wetland areas" means those lands extending landward for two hundred feet in all directions as measured on a horizontal plane from the ordinary high water mark; floodways and contiguous floodplain areas landward two hundred feet from such floodways; and all marshes, bogs, swamps, and river deltas associated with the streams, lakes, and tidal waters which are subject to the provisions of this chapter; the same to be designated as to location by the department of ecology.) (WAC -420(5)(a))? ✓

b. Is the facility located in an area where the local shoreline management master program permits industrial,

navigation, manufacturing, or similar activities (areas classified as natural, conservancy, rural or residential may not be used for dangerous waste management: WAC -420(5)(b))? ___ ✓

D. Sole Source Aquifer Criteria (WAC -420(6)). Yes No

Is this a new facility (constructed and operating after November 19, 1980 for EPA wastes, after August 9, 1982 for state-only wastes) that is disposing of dangerous waste over a sole source aquifer designated pursuant to section 1424(3) of the Safe Drinking Water Act? ___ ✓

Comments _____

4. SECURITY (WAC -310). Yes No

A. Can the facility O/O demonstrate that:

a. Physical contact with wastes or equipment within the active portion will not injure persons or livestock (WAC -310(1)(a))? ___ ___

b. Disturbance of wastes by persons or livestock will not result in violations of ch. 173-303 WAC (WAC -310(1)(b))? ___ ___

B. If the facility O/O cannot demonstrate both of the above, then does the facility have:

a. Either:

i. A barrier (artificial, natural or both) which completely surrounds the active portion, with a means to control access through gates or other entrances to the active portion at all times (WAC -310(2)(c))? ✓ ___

ii. Or, a twenty-four hour surveillance system to monitor and control entry to the active portion (WAC -310(2)(b))? ✓ ___

b. And, signs which (WAC -310(2)(a)):

i. Are posted at each entrance to the active portion, and at other locations in sufficient numbers to be seen from any approach? ✓ __

ii. Bear the legend (or an equivalent one), written in English, "Danger-Unauthorized Personnel Keep Out"? ✓ __

iii. Are legible from a distance of twenty-five feet or more? ✓ __

C. If the facility has or is a totally enclosed treatment facility or elementary neutralization or wastewater treatment unit, in lieu of item B., above, does the O/O prevent unknowing entry and minimize the possibility of unauthorized entry by persons or livestock onto those portions of his facility (WAC -310(3))? Yes ✓ No __

Comments Part A Not needed and not answered.

5. MANIFEST SYSTEM (WAC -370). Yes No

A. Does the facility receive any manifested shipments of dangerous waste from off-site? ✓ __

If "No," then do not complete the rest of the questions in this section 5. Manifest System. If "Yes," complete the remaining questions.

B. Does the O/O retain copies of all manifests and shipping papers at the facility for at least three years after shipments are delivered (WAC -370(2)(e) and (3)(e))? ✓ __

C. When a shipment is received accompanied by a manifest, does the O/O or his agent:

a. Sign and date each copy of the manifest to certify receipt (WAC -370(2)(a))? ✓ __

b. Note any significant discrepancies on each copy of the manifest (WAC -370(2)(b))? ✓ __

c. Immediately give the transporter at least one copy of the signed manifest (WAC -370(2)(c))? ✓ __

d. Within thirty days after delivery, send a copy of the signed manifest to the generator (WAC -370(2)(d))? ✓ ___

D. When a shipment accompanied by a manifest or shipping paper (M/SP) is received from a rail or water transporter, does the O/O or his agent: Yes No

a. Sign and date each copy of the M/SP to certify receipt (WAC -370(3)(a))? ✓ ___

b. Note any significant discrepancies on each copy of the M/SP (WAC -370(3)(b))? ✓ ___

c. Immediately give the rail or water transporter at least one copy of the M/SP (WAC -370(3)(c))? ✓ ___

d. Within thirty days after delivery, send a copy of the signed M/SP to the generator (WAC -370(3)(d))? ✓ ___

If the manifest is not received within thirty days after delivery, send a copy of the signed and dated shipping paper to the generator (WAC -370(3)(d))? ✓ ___

E. Does the O/O:

a. Have procedures which he follows to identify significant discrepancies between the shipments he receives and the shipment described on the manifest? ✓ ___

b. Detect the following types of significant discrepancies (WAC -370(4)(a)): ✓ ___

i. Variations in quantities of greater than ten percent for bulk shipments? ✓ ___

ii. Variations in piece count (e.g., missing containers or packages)? ✓ ___

iii. Variations in waste type, discovered by inspection or waste analysis (e.g., acid substituted for solvent)? ✓ ___

c. Attempt to resolve significant discrepancies (if any) with the transporter or generator (WAC -370(4)(b))? ✓ ___

d. If a significant discrepancy is not resolved within fifteen days of its discovery, immediately submit a manifest discrepancy report and a copy of the manifest or shipping paper to WDOE (WAC -370(4)(b))? ___ When Necessary

List any dates since the last inspection (or since notification if this is the first inspection) that the O/O submitted manifest discrepancy reports (if any) to WDOE.

_____	_____
_____	_____
_____	_____
_____	_____

F. Under certain circumstances the O/O may refuse acceptance of a waste shipment and send it on to another facility. Yes No

a. Does the O/O deny receipt of a shipment only under the following circumstances (WAC -370(5)(a)):

i. His facility is not capable of properly managing the waste? ✓ ___

ii. There is a significant discrepancy between the shipment and the manifest or shipping paper? ✓ ___

iii. The shipment has arrived in a condition which would present an unreasonable hazard to his facility operations or personnel? ✓ ___

b. If the O/O chooses to deny receipt of the shipment but the containers are damaged or the waste is in a condition that would pose a hazard if transported, does the O/O implement the provisions of his contingency plan designed to address such situations (WAC -370(5)(c))? ✓ ___

c. When he denies receipt of the shipment, does the O/O either send the shipment on to the alternate facility designated on the manifest or shipping paper, or contact the generator to identify another facility and provide for the shipment's delivery to that facility (WAC -370(5)(b))? ✓ ___

Comments The wastes come in under a profile system - problems are sorted out before reaching the facility - Some just show up - If wastes are not received - The shipment is sent back to fill out Profile sheet / or given location of a facility to handle wastes -

6. WASTE ANALYSIS (WAC -300). Yes No

A. Does the facility O/O have a waste analysis plan which is kept at the facility (WAC -300(5))? ✓ ___

B. Does the waste analysis plan cover the following areas:

a. How the O/O shall obtain detailed chemical, physical, or biological analyses of wastes adequate to assure safe TSD in accordance with Ch. 173-303 WAC, including where appropriate: data from existing documents or publications; data on wastes generated from similar processes; or, data from actual testing (WAC -300(2))?

Profile system used - To ID waste before arriving at site.

b. For facilities receiving waste shipments from off-site, how the O/O shall confirm that each waste received matches the identity of the waste specified in the manifest or shipping paper (WAC -300(3))?

Spot checking

c. Repeating of analyses to assure accurate information as necessary, including repeat analyses at least when: the O/O has been notified or has reason to believe that the process generating the waste has significantly changed; and, a waste received from off-site does not match the identity specified on the manifest or shipping paper (WAC -300(4))?

Profile/spot checks - same generator Spot check. — —

C. Does the waste analysis plan assure that the areas described under item B., above, are adequately satisfied by inclusion of at least the following:

a. The parameters for which each waste will be analyzed and rationale for these parameters (WAC -300(5)(a))? ✓ —

b. The methods of obtaining or testing for these parameters (WAC -300(5)(b))? ✓ —

c. The methods for obtaining representative waste samples (WAC -300(5)(c))? ✓ —

d. The frequency with which analyses will be reviewed or repeated to assure accurate and current information (WAC -300(5)(d))? ✓ —

e. The waste analyses which generators have agreed to provide (WAC -300(5)(e))? ✓ —

f. The procedures for quality assurance and quality control, including at least:

i. Measures to prevent sample contamination during sampling? ✓ —

ii. Certification/documentation of sampling and testing procedures? ✓ —

iii. Evaluation of personnel performance of sampling/testing? ✓ —

iv. Chain of custody procedures? ✓ —

v. Inspection, calibration, testing, and maintenance of sampling and analysis equipment? ✓ ___

g. For facilities receiving wastes from off-site, the procedures for confirming the waste identity specified on the manifest or shipping paper (WAC -300(5)(g))? ✓ ___

Do these procedures include at least:

i. Procedures for identifying each waste movement at the facility? ✓ ___

ii. Methods for obtaining representative waste samples, if the identification method involves sampling? ✓ ___

h. Methods for meeting the additional waste analysis requirements for specific waste management methods as specified for interim and final status TSD under items D. and E., below (WAC -300(5)(f))? ✓ ___

D. Interim Status Waste Analysis Requirements for Specific Waste Management Methods.

Where appropriate, does the waste analysis plan include procedures for the following interim status management methods:

a. Containers.

i. Determining compatibility of a waste to a container (if not determined when containers were first selected)? ✓ ___

ii. Determining compatibility of a waste to other wastes or materials stored nearby? ✓ ___

iii. Determining compatibility of a waste to wastes previously held in reused containers that were not decontaminated? ✓ ___

iv. Analyzing ignitable/reactive containerized wastes? ✓ ___

v. Analyzing liquids that are collected in a storage area? ✓ ___

vi. Determining whether or not runoff collected from the active portion would be designated as a dangerous waste? ✓ ___

b. Tanks (40 CFR 265.193).

i. Determining compatibility of a waste to a tank (if not determined when tank was first selected)? ✓ ___

ii. Determining compatibility of a waste to any raw materials or other wastes potentially or previously held in the tank by conducting analyses or trial treatment or storage tests (e.g., bench scale, pilot plant) or by obtaining written documented information on similar storage or treatment of similar wastes under similar conditions? ✓ ___

iii. Determining the compatibility of a waste to other wastes or materials held or treated nearby? / ___

iv. Analyzing ignitable/reactive wastes managed in tanks? ✓ ___

v. Determining whether or not runoff collected from the active portion would be designated as a dangerous waste? ✓ ___

c. Surface Impoundments (40 CFR 265.225).

i. Determining compatibility of a waste to the impoundment's materials of construction (if not determined when materials were first selected)? Have no Surface Impoundment

ii. Determining the compatibility of a waste to any raw materials or other wastes potentially previously held in the impoundment by conducting analyses or trial treatment or storage tests, or by obtaining written documented information on similar treatment or storage of similar wastes under similar conditions? ___ ___

iii. Determining the compatibility of a waste to other wastes or materials held or treated nearby? ___ ___

iv. Procedures for analyzing ignitable/reactive wastes managed in impoundments? ___ ___

v. Determining whether or not runoff (if any) collected from the active portion would be designated as a dangerous waste? ___ ___

d. Waste Piles (40 CFR 265.252).

i. Determining the compatibility of a waste to the pile's materials of construction (if not determined when materials were first selected)? ___ ___

ii. Determining the compatibility of each waste to be added to the pile (including visual comparison of color and texture) to assure that inadvertent mixing of incompatible wastes does not occur, unless the O/O can show that either: the only wastes to be added to the pile are compatible; or, the waste

received is compatible with the waste in the pile to which it is added?

iii. Determining the compatibility of a waste to other wastes or materials potentially held or treated nearby.

iv. Determining the compatibility of a waste to wastes previously held on the pile base if it was not decontaminated (unless it can be proven the wastes are the same)?

v. Analyzing ignitable/reactive wastes managed in waste piles?

vi. Sampling and analyzing leachate collected beneath the pile, and managing the leachate if hazardous?

vii. Determining whether or not runoff collected from the active portion would be designated as a dangerous waste?

e. Land Treatment (40 CFR 265.273).

i. Determining the concentration in the waste of any substances which exceed the EP toxicity concentration limits of WAC -090(8)(c)?

ii. For any waste listed in WAC -081 or -082, determining the concentrations of any substances which caused the waste to be listed?

iii. For any waste mixture designated under WAC -084 or the criteria of WAC -101 through -103, determining the concentrations of any substances which caused the waste to be designated?

iv. If food chain crops are grown, procedures for determining the concentrations of arsenic, cadmium, lead and mercury, unless the O/O has written, documented data showing the constituent is not present?

v. Procedures to determine the compatibility of a waste to any raw materials or other wastes potentially applied in a given treatment zone?

vi. Determining the compatibility of a waste to other wastes or materials held or treated nearby?

vii. Procedures for analyzing ignitable/reactive wastes to be treated?

viii. Determining whether or not runoff collected from the active portion would be designated as a dangerous waste?

f. Landfills.

Yes No

Have no Landfills

i. Inspecting containers for free liquids before disposal and for handling any unacceptable free liquids that may appear?

ii. Inspecting containers for 90% volume by waste and for handling any containers of waste that are unacceptable by the facility that may appear?

iii. Determining the compatibility of a waste to landfill liner(s) and leachate collection system materials (if not determined when materials were first selected)?

iv. Determining the compatibility of a waste to any other wastes potentially disposed in the landfill?

v. Analyzing ignitable/reactive wastes to be disposed?

vi. Sampling and analyzing leachate collected and managing the leachate if dangerous?

vii. Determing whether or not runoff collected from the active portion would be designated as a dangerous waste?

g. Incinerators (40 CFR 265.341).

Do not Incinerate

i. Analyzing any waste not previously burned in the incinerator to enable the O/O to establish steady state operating conditions and to determine the types of pollutants which might be emitted?

Do these analyses include determining at least:

1. Heating value of the waste?

2. Halogen and sulfur content of the waste?

3. Concentrations of lead and mercury in the waste, unless the O/O has written, documented data showing that the element is not present?

ii. Determining the compatibility of wastes to be mixed in the incinerator, and the compatibility of wastes to be burned with the incinerator's materials of construction?

iii. Determing whether or not runoff collected from the active portion would be designated as a dangerous waste?

h. Thermal Treatment (40 CFR 265.375). Yes No

i. Analyzing any waste not previously treated in the thermal treatment unit to enable the O/O to establish steady state operating conditions and to determine the types of pollutants which might be emitted? Heat is used to breakup emulsions

Do these analyses include determining at least:

1. Heating value of the waste?

2. Halogen and sulfur content of the waste?

3. Concentrations of lead and mercury in the waste, unless the O/O has written, documented data showing that the element is not present? In the completed Plan for wastes.

ii. Determining the compatibility of wastes to be mixed in the thermal treatment unit, and the compatibility of wastes to be burned with the unit's materials of construction? ✓

iii. If open burning of wastes is conducted, analyzing the wastes to assure that only explosive wastes with the capability of detonation are being open burned? only heat to 190°F — No burning

vi. Determing whether or not runoff collected from the active portion would be designated as a dangerous waste? ✓

i. Chemical, Physical and Biological Treatment (40 CFR 265.402).

i. Whenever substantially different wastes are to be treated or substantially different treatment processes are to be used:

1. Procedures for conducting waste analyses and trial treatment tests (e.g., bench scale, pilot plant)? ✓

2. Or else, procedures for obtaining written, documented information on similar treatment of similar wastes under similar conditions? ✓

ii. Procedures to determine the compatibility of a waste to process structure (if not determined when structure was first selected)? ✓

iii. Procedures to determine the compatibility of a waste to any raw materials or other wastes potentially or previously held in the process structure? ✓ ___

iv. Procedures to determine the compatibility of a waste to other wastes or materials held or treated nearby? ✓ ___

v. Procedures for analyzing ignitable/reactive wastes managed in the process structure? ✓ ___

vi. Determing whether or not runoff collected from the active portion would be designated as a dangerous waste? ✓ ___

E. Final Status Waste Analysis Requirements for Specific Waste Management Methods.

[Reserved]

Comments The facility treats waste to met METRO Discharge permit values, remove oil from the water phase. Treat low level chromium waste waters Sludge obtained over time - removed and manifest as D007 DW Sludges from oil storage tanks - generated and manifested as WT02 DW Waste.
Flammable/reactive waste are not treated at this facility. If they come in containers the facility may store them until a site is found for disposal/treatment -

7. INSPECTIONS (WAC -320).	Yes	No
A. Does the facility O/O have a written inspection schedule which is kept at the facility (WAC -320(2))?	✓	
B. Does the facility O/O keep a written inspection log or summary (WAC -320(2)(d)):		
a. Which shows that the inspection schedule is being followed?	✓	
b. Including at least:		
i. The time, date, and nature of the inspection?	✓	
ii. The printed name and handwritten signature of the inspector?	✓	
iii. Notations of observations made?	✓	
iv. Date and nature of any repairs or remedial actions?	✓	
c. For at least three years from the date of inspection?	✓	
C. When the facility O/O discovers any problems during an inspection, does he remedy the problems on a schedule which prevents hazards to the public health and the environment (immediately where a hazard is imminent or has already occurred) (WAC -320(3))?	✓	
D. Does the inspection schedule identify (WAC -320(2)):		
a. The areas of the facility to be inspected?	✓	
b. The equipment to be inspected, including at least all:		
i. Monitoring equipment?	✓	
ii. Safety and emergency equipment?	✓	
iii. Security devices?	✓	
iv. Operating and structural equipment that help prevent, detect or respond to hazards to public health or the environment?	✓	
c. Areas subject to spills (to be inspected daily when in use)?	✓	
d. The frequencies with which these areas and items are to be inspected?	✓	
e. The types of problems to be looked for during inspections?	✓	

f. And the additional inspections to be conducted for specific waste management methods as specified for interim and final status TSD under items E. and F., below? ✓ ___

E. Interim Status Inspection Requirements for Specific Waste Management Methods. Yes No

Where the following types of management methods are employed, does the inspection schedule specify the additional items to be inspected, inspection frequency and types of problems to be looked for?

a. Containers (40 CFR 265.174).

i. Areas where containers are held, at least weekly, to detect leaks and deterioration caused by corrosion and other factors? ✓ ___

ii. Areas where containers are held to assure that:

1. Maximum storage capacity is not exceeded? ✓ ___

2. Incompatible wastes are not stored together? ✓ ___

3. Ignitable or reactive waste containers are not stored near sources of heat, ignition or reaction? ✓ ___

4. Proper containers are used for holding wastes? ✓ ___

b. Tanks (40 CFR 265.194).

Wherever present:

i. Discharge control equipment (e.g., bypass systems) at least once each operating day? ✓ ___

ii. Data gathered from monitoring equipment (e.g., pressure gauges) at least once each operating day? ✓ ___

iii. The level of waste in the tank at least once each operating day? ✓ ___

iv. The construction materials of the tank at least weekly to detect corrosion or deterioration? ✓ ___

v. The construction materials of, and the area immediately surrounding, discharge confinement structures (e.g., dikes) for signs of erosion or leakage (e.g., cracks, wet spots) at least weekly? ✓ ___

c. Surface Impoundments (40 CFR 265.226).

Do not Have Surface Impoundments

i. The freeboard level at least once each operating day?

ii. The surface impoundment, including dikes and vegetation surrounding the dike for signs of leaks, deterioration or failures at least weekly?

d. Waste Piles.

No waste Piles

i. Run-on and run-off control systems (if any) for signs of leaks, failure or deterioration?

ii. Covers, buildings or other mechanisms (if any) for repelling precipitation and run-on for leaks, deterioration, or failure?

iii. Covers or other methods (if any) to prevent wind dispersal?

e. Land Treatment.

No Land Treatment

i. Run-on and run-off control systems for signs of leaks, deterioration or failure?

ii. Wind dispersal control measures (if any)?

iii. The land treatment area, to assure that:

1. Waste and/or material (e.g., water) application rates are not exceeded?

2. Ignitable, reactive and/or incompatible wastes are protected from sources of ignition or reaction?

f. Landfills.

No Landfills

i. Run-on and run-off control systems for signs of leaks, deterioration or failure?

ii. Wind dispersal control measures (if any)?

iii. Covers over any closed cells or parts of the landfill to detect signs of erosion, leaks, deterioration or failure of the cap?

iv. Active cells to assure that incompatible wastes are not disposed together?

v. Cells in which ignitable wastes in containers are disposed (if any) to assure that they are not being exposed to materials or conditions that could cause them to ignite?

g. Incinerators (40 CFR 265.347).

i. Existing instruments which relate to combustion and emission control at least every 15 minutes (e.g., instruments measuring waste feed, auxiliary fuel feed, air flow, temperature, scrubber flow, scrubber pH and relevant level controls)?

ii. The complete incinerator and associated equipment at least daily for leaks, spills, fugitive emissions and deterioration?

iii. All emergency shutdown controls and alarm systems at least daily to assure proper operation?

Do not Incinerate

h. Thermal Treatment (40 CFR 265.377).

i. Existing instruments which relate to temperature and emission control (e.g., instruments measuring waste feed, auxiliary fuel feed, temperature, and relevant process flow and level controls) at least every 15 minutes?

ii. The stack plume (emissions), observed visually at least every hour for normal appearance (color, opacity)?

iii. The complete treatment process and associated equipment at least daily for leaks, spills, fugitive emissions and deterioration?

iv. All emergency shutdown controls and alarm systems at least daily to assure proper operation?

v. For open burning of waste explosives, the area of open burning to assure that it meets the minimum distance to the nearest other property limits?

Heat is used to break up emulified oils and or liquids

Do not burn

i. Chemical, Physical and Biological Treatment (40 CFR 265.403).

i. Discharge control and safety equipment (e.g., cut-off and bypass systems) at least once each operating day?

ii. Data gathered from monitoring equipment at least once each operating day?

iii. Construction materials of the treatment process or equipment at least weekly for signs of corrosion, leaks, deterioration, or failure?

iv. Construction materials of and areas immediately surrounding discharge confinement structures (e.g., dikes) at least weekly for signs of erosion, leakage, deterioration or failure (e.g., cracks, wet spots, dead vegetation)?

F. Final Status Inspection Requirements for Specific Waste Management Methods.

	Yes	No

Where the following types of management methods are employed, does the inspection schedule specify the additional items to be inspected, inspection frequency and types of problems to be looked for?

[Reserved.]

G. Ignitable or Reactive Waste Storage Inspections.

	Yes	No
Does the O/O ever store ignitable or reactive wastes at the facility?	✓	
If "Yes":		
a. Are those areas where ignitable or reactive wastes are stored inspected at least yearly by a professional person familiar with the Uniform Fire Code, or by a federal, state, or local fire marshal (WAC -395(1)(d))?	✓	
b. Does the O/O keep records of these fire inspections which describe:		
i. The dates and times of inspection and name(s) of inspector(s)?	✓	
ii. Observations of any unsafe or improper ignitable or reactive waste handling?	✓	
iii. Measures taken to correct any unsafe or improper ignitable or reactive waste handling?	✓	
c. Are records of these inspections entered in the inspection log or summary? (If "No," then these records must be entered in the operating record.)	✓	

Comments The facility is required to notify the Seattle Fire Marshall if ignitable/reactive wastes are to be received for storage/holding.

The Port of Seattle also requires such information.

The Chemical Processors, Inc. site on Pier 91 is leased from the Port of Seattle. The Port is the owner of the Pier. All Part A / Notification / Annual Reports go through the Port.

The facility lists D003 - Reactive waste D001 - Flammable - So that the facility can receive them, if necessary, or for purpose of storing.

8. PERSONNEL TRAINING (WAC -330).	Yes	No
A. Does the facility O/O have a written training plan, kept at the facility site (WAC -330(2))?	✓	
B. Does the training plan include the following documents and records:		
a. For each position related to the handling of dangerous waste on-site, the job title, name of employee filling each job, and the job description, including requisite skills, education, qualifications, and duties for each position (WAC -330(2)(a))?	✓	
b. Written description of type and amount of introductory and continuing training needed for each position (WAC -330(2)(b))?	✓	
c. Records documenting that employees have received and completed the necessary training (WAC -330(2)(c))?	✓	
C. Are training records retained for at least three years after an employee last worked at the facility, or until the facility closes, whichever, occurs first (WAC -330(3))? (Note: Records may have been transferred within the company to follow an employee. This is permissible, but some record of the employee's transfer and continued employment should be documented.)	✓	
D. Does the O/O provide a training program that teaches personnel to perform their duties in ways that ensures the facility's compliance with WAC 173-303 (WAC -330(1))?	✓	

E. Does the training program involve:

Classroom Instruction?	✓
On-the-job training?	✓

F. Is the training program directed by a person knowledgeable in dangerous waste handling practices (WAC -330(1)(a))? ✓ ___

G. Do the O/O's employees participate in an annual review of the training provided in the training program (WAC -330(1)(b))? ✓ ___

H. Is the training program successfully completed by each employee within six months of being employed at the facility, or of being assigned to a new position, whichever is later (WAC -330(1)(c))? ___ ___ a job is started training that is specific for the job - Job change

I. Are new employees supervised until they complete the training program (WAC -330(1)(c))? ___ ___ Training for new job as required.

J. Does the training program:

a. Include training relevant to the positions in which personnel are employed (WAC -330(1)(a))? ✓ ___

b. Instruct personnel on contingency plan implementation (WAC -330(1)(a))? ✓ ___

c. Familiarize personnel with emergency equipment and systems, and emergency procedures (WAC -330(1)(d))? ✓ ___

K. Where applicable, does the training program include the following parameters (WAC -330(1)(d))?

a. Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment. ✓ ___

b. Key parameters for automatic waste feed cut-off systems. ✓ ___

c. Communications or alarm systems. ✓ ___

d. Response to fires or explosions. ✓ ___

e. Response to ground water contamination. ✓ ___

f. Shutdown of operations. ✓ ___

Comments: The Fire Dept. puts on the Fire Safety program and related training comes from within the company. How to fill out manifest / treat tanks / waste receiving procedures.

Inspections and items to check for / testing methods / what to do when shipment does not have a profile sheet / Filling Tanks / discharging to METRO - How / what to do when ..... / and related training -

9. PREPAREDNESS AND PREVENTION (WAC -340).

	Yes	No
A. Unless it can be demonstrated that the equipment is not necessary (specify why not in the Comments, below), are the following equipment present, tested regularly, and kept in good working order:		
a. Internal communications or alarm system capable of providing immediate emergency instructions (WAC -340 (1)(a))?	✓	—
Present?	✓	—
Tested regularly?	✓	—
Good working order?	✓	—
b. A device capable of summoning police or fire departments or emergency response teams (e.g., telephone, two-way radio) (WAC -340(1)(b))?	✓	—
Present?	✓	—
Tested regularly?	✓	—
Good working order?	✓	—
c. Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment (WAC -340(1)(c))?	✓	—
Present?	✓	—
Tested regularly?	✓	—
Good working order?	—	—
d. Water at adequate volume/pressure to supply hose streams, foam equipment, sprinklers or spray systems (WAC -340(1)(d))?	✓	—
Present?	✓	—
Tested regularly?	✓	—
Good working order?	—	—
B. Whenever dangerous waste is being handled, do all personnel involved have immediate access to an internal alarm or emergency communication system, either directly or		

through visual or voice contact with another employee (WAC -340(2)(a))? ✓ ___

C. If there is ever just one employee present on the premises, does he have immediate access to a device (e.g., telephone, two-way radio) capable of summoning external emergency help (WAC -340(2)(b))? ✓ ___

D. Is adequate aisle space provided to allow for inspections and unobstructed movement of personnel, fire and spill control equipment and decontamination equipment during an emergency (WAC -340(3))? ✓ ___

E. Do the hazards posed by the wastes handled at the facility require arrangements with local authorities? (If "Yes," complete the remaining questions, F. through J. below. If "No," document under Comments, below, why the hazards are not such as to warrant these arrangements.) ✓ ___

F. Has the O/O arranged to familiarize police, fire departments, and emergency response teams with: the layout of his site; properties of wastes handled and associated hazards; places where personnel would normally be working; entrances to and roads on the site; and possible evacuation routes (WAC -340(4)(a))? ✓ ___

G. Has the O/O arranged to familiarize local hospitals with the properties of dangerous wastes handled and the types of injuries or illnesses which could result from fires, explosions, or waste releases (WAC -340(4)(b))? ✓ ___

H. Does the O/O have agreements with state emergency response teams, emergency response contractors, and equipment suppliers (WAC -340(4)(c))? ✓ ___

I. Where more than one party might respond to an emergency, does the O/O have agreements designating primary emergency authority and support services to be provided (WAC -340 (4)(d))? ✓ ___

J. Has the O/O documented all instances where state or local authorities have declined to enter into the above arrangements (WAC -340(5))? ✓ ___

Comments: The facility has a foam system which is checked yearly / also checked from time to time by employees.

10. CONTINGENCY PLAN, EMERGENCY PROCEDURES AND EMERGENCIES (WAC -350 AND -360).

	Yes	No
A. Does the O/O have a contingency plan designed to lessen the potential impacts of a fire, explosion, or unplanned sudden or nonsudden release of dangerous wastes or dangerous waste constituents to air, soil, surface, or ground water (WAC -350(1))?	✓	
B. Does the O/O have a Spill Prevention Control and Countermeasures (SPCC) plan amended to include a contingency plan (WAC -350(2))?	✓	
C. Are copies of the contingency plan and revisions to it:		
a. Maintained at the facility (WAC -350(4)(a))?	✓	
b. Submitted to all local police departments, fire departments and hospitals, and state and local emergency response teams that may provide emergency assistance (WAC -350(4)(b))?	✓	
D. Is the contingency plan amended whenever:		
a. Applicable regulations are revised (WAC -350(5)(a))?	✓	
b. The plan fails in an emergency (WAC -350(5)(b))?	✓	
c. The facility changes in a way that increases the potential for fires, explosions or releases, or that changes the necessary emergency responses (WAC -350(5)(c))?	✓	
d. The list of emergency coordinators changes (WAC -350(5)(d))?	✓	
e. The list of emergency equipment changes (WAC -350 (5)(e))?	✓	
E. Does the contingency plan include:		
a. A description of the actions personnel must take in the event of an emergency circumstance (WAC -350 (3)(a))?	✓	
b. A description of the arrangements agreed to by local police and fire departments, hospitals, contractors, and state and local response teams to coordinate emergency services (WAC -350(3)(c))?	✓	

c. A current list of emergency coordinators, including names, addresses and 24-hour phone numbers (WAC -350(3)(d))? ✓ ___

d. If more than one emergency coordinator is listed, identification of a primary emergency coordinator, with the others listed in the order that they will assume responsibility as alternates (WAC -350(3)(d))? ✓ ___

e. A list of all emergency equipment kept on the site, including the location, physical description, and brief outline of the capability of each piece of equipment (WAC -350(3)(e))? ✓ ___

f. An evacuation plan (where evacuation could be necessary) for personnel, which describes signals to begin evacuation, evacuation routes, and alternate routes (WAC -350(3)(f))? ✓ ___

g. Provisions for removal of dangerous waste from the facility in the event of a flood if the facility is located in a 100-year floodplain (WAC -420(4)(a))? ✓ ___

h. Actions to be taken in the event that a dangerous waste shipment is received which cannot be managed at the facility and is not acceptable to the O/O, but cannot be transported back to the generator or an alternate facility because it is damaged or would pose a risk to public health or the environment (WAC -350(3)(b))? ✓ ___

F. Do the information and elements described in the contingency plan assure that the O/O has taken adequate precautions for reacting to emergency circumstances? (If "No," specify what inadequacies exist in the Comments section, below.) ✓ ___

G. Is an emergency coordinator on the premises at all times or available on-call at all times (WAC -360(1))? ✓ ___

H. Is the emergency coordinator (and his alternates, if any) capable in the following areas (WAC -360(1)):

a. Familiar with all aspects of the contingency plan? ✓ ___

b. Familiar with all operations and activities on the facility? ✓ ___

c. Familiar with the location and properties of all wastes handled? ✓ ___

d. Familiar with the location of all records kept on-site? ✓ ___

e. Familiar with the facility layout? ✓ ___

f. Has the authority to commit the resources needed to carry out the contingency plan? ✓ ___

I. Are the following procedures implemented (or, to be implemented) in the event of an emergency: Yes No

a. Does the emergency coordinator or his designee (EC/D) immediately activate internal alarms or communication systems to notify all personnel (WAC -360(2)(a)(i)) and notify appropriate state or local agencies with designated response roles if help is needed (WAC -360(2)(a)(ii))? ✓ ___

b. Does the EC/D immediately identify the character, exact source, amount and areal extent of any released materials (WAC -360(2)(b))? ✓ ___

c. Concurrently, does the EC/D assess possible hazards to human health and the environment (including direct, indirect, immediate and long-term effects) that may result from the emergency (WAC -360(2)(c))? ✓ ___

d. If the EC/D determines that the emergency could threaten human health or the environment outside the facility, does he immediately notify and provide an assessment report (which must include the information described under e., below) to:

i. The appropriate local authorities if evacuation of local areas may be advisable; and remain available to help appropriate officials decide if local areas should be evacuated (WAC -360 (2)(d)(i))? ✓ ___

ii. WDOE and either the government official designated as on-the-scene coordinator, or the National Response Center (WAC -360(2)(d)(ii))? ✓ ___

e. Does the assessment report (covered under d., above) include:

i. Name and telephone number of reporter (WAC -360(2)(e)(i))? ✓ ___

ii. Name and address of the facility (WAC -360(2)(e)(ii))? ✓ ___

iii. Time and type of emergency (e.g., fire, release) (WAC -360(2)(e)(iii))? ✓ ___

iv. Name and quantity of materials involved (WAC -360(2)(e)(iv))? ✓ ___

v. The extent of injuries, if any (WAC -360(2)(e)(v))? ✓ ___

vi. Possible hazards to human health and the environment off the site (WAC -360(2)(e)(vi))? ✓ __

f. During an emergency, does the EC/D take all measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other dangerous wastes (e.g., stopping processes or operations, collecting and containing releases, removing or isolating containers, etc.) (WAC -360(2)(f))? ✓ __

g. If operations stop in response to an emergency, does the EC/D monitor for leaks, pressure buildup, gas generation or ruptures wherever appropriate (WAC -360(2)(g))? ✓ __

h. Immediately after an emergency, does the EC/D provide for treating, storing, or disposing wastes and materials resulting from the emergency (WAC -360 (2)(h))? ✓ __

i. Does the EC/D ensure, in the affected areas on the site, that:

i. No waste that may be incompatible with the released material is treated, stored, or disposed until cleanup procedures are completed (WAC -360(2)(i)(i))? ✓ __

ii. All emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations resume (WAC -360(2)(i)(ii))? ✓ __

j. Does the O/O notify WDOE, and appropriate local authorities, that his site satisfies the conditions described under i. and ii. above, before operations resume in the affected areas of his site (WAC -360(2)(j))? ✓ __

k. Does the O/O note in his operating record the time, date, and details of incidents requiring implementation of the contingency plan (WAC -360(2)(k))? ✓ __

l. Within 15 days after the emergency, does the O/O submit a written report of the incident to WDOE which includes:

i. Name, address, and telephone number of the O/O (WAC -360(2)(k)(i)) and of the facility (WAC -360(2)(k)(ii))? ✓ __

ii. Date, time, and type of emergency (WAC -360(2)(k)(iii))? ✓ __

iii. Name and quantity of materials involved (WAC -360(2)(k)(iv))? ✓ __

iv. The extent of injuries, if any (WAC -360 (2)(k)(v))? ✓ __

v. An assessment of actual or potential hazards to human health or the environment, where this is applicable (WAC -360(2)(k)(vi))? ✓ __

vi. Estimated quantity and disposition of recovered material that resulted from the incident (WAC -360(2)(k)(vii))? ✓ __

Comments: The contingency plan is attached date May 1987.

11. PRECAUTIONS FOR IGNITABLE, REACTIVE OR INCOMPATIBLE WASTES (WAC -395(1)).

	Yes	No
A. Does the O/O ever manage ignitable, reactive or incompatible wastes at his facility? (If "No," describe under Comments, below what measures the O/O takes to assure that no ignitable, reactive, or incompatible wastes are managed. Do not complete the remaining questions in this section.)	See Comments	
B. Does the O/O take precautions to prevent accidental ignition or reaction of ignitable or reactive wastes, including but not limited to (WAC -395(1)(a)):		
a. Separating and protecting the waste from sources of ignition or reaction (e.g., open flames, smoking, cutting and welding, hot surfaces, sparks, spontaneous ignition, and radiant heat?		

b. While ignitable or reactive waste is being handled does the O/O confine smoking and open flame to specially designated locations? — —

c. Posting "No Smoking" signs in conspicuous places wherever there is a hazard from ignitable or reactive waste? — —

C. Is the management of ignitable or reactive waste, and the mixture or commingling of incompatible wastes or incompatible wastes and materials conducted so that it does not:

a. Generate extreme heat, pressure, fire, explosion, or violent reaction (WAC -395(1)(b)(i))? — —

b. Produce uncontrolled toxic mists, fumes, dusts or gases that threaten human health or the environment (WAC -395(1)(b)(ii))? — —

c. Produce uncontrolled flammable fumes or gases that pose a risk of fire or explosion (WAC -395(1)(b)(iii))? — —

d. Damage the structural integrity of the tank or equipment (WAC -395(1)(b)(iv))? — —

e. Otherwise threaten human health or the environment (WAC -395(1)(b)(v))? — —

D. Does the O/O document these precautions in his operating record (WAC -395(1)(c))? — —

Comments: The Fire Dept. is alerted when EVER the facility is to receive ignitables. SEATTLE FIRE DEPT. Requirement for all incoming ignitable to Pier 91. The facility at times stores ignitable - If O.K. from Fire Dept. if a problem which may be come serious if the material was is not accepted.

12. LOADING AND UNLOADING AREAS (WAC -395(4)).

	Yes	No
Does the facility receive manifested shipments of liquid dangerous waste for management?	✓	
If "Yes":		
A. Has the O/O provided an area (or areas) for loading and unloading waste shipments?	✓	
B. Is each loading/unloading area designed, constructed, operated and maintained to:		
a. Contain spills and leaks that might occur during loading/unloading (WAC -395(4)(a))?	✓	
b. Prevent release of wastes or waste constituents to ground or surface waters (WAC -395(4)(b))?	✓	
c. Contain washwaters (if any) from the cleaning and decontamination of transport vehicles and load/unload equipment (WAC -395(4)(c))?	✓	
d. Allow for removal, as soon as possible, of collected wastes from spills, leaks and equipment washwaters (if any) in a manner to prevent releases to ground or surface waters (WAC -395(4)(d))?	✓	

Comments: The main receiving area is a sloped area where wastes can be off loaded and if leaks develop can control.

13. RECORDKEEPING (WAC -380).

	Yes	No
A. Operating Record.		
a. Does the O/O keep a written operating record at his facility which he maintains until his facility is closed (WAC -380(1))?	✓	
b. Does the operating record include the following information:		
i. Records and results of waste analyses (WAC -380(1)(c))?	✓	
ii. Summary reports and details of all incidents that required implementing the contingency plan (WAC -380(1)(d))?	✓	

iii. Records and results of all inspections (WAC -380(1)(e)) (Note--This information need only be kept for three years)? ✓ __

iv. Monitoring, testing, or analytical data as required under the specific unit requirements for interim and final status (e.g., ground water monitoring data, incinerator stack emission analyses, etc.) (WAC -380(1)(f))? ✓ __

v. All closure and post-closure cost estimates (WAC -380(1)(g))? ✓ __

vi. For off-site facilities, copies of notices to generators informing them the facility has all appropriate permits (WAC -380(1)(h))? ✓ __

c. Does the O/O keep in his operating record the following information regarding the types of wastes he receives or manages on-site (WAC -380(1)(a)):

i. A description of each waste providing the common name, waste number, and physical form (e.g., liquid, solid) (WAC -380(2)(a) and (b))? ✓ __

ii. Where a waste contains more than one process waste or waste constituent, all applicable waste numbers or else a description of the process which generated the waste (WAC -380 (2)(a))? ✓ __

iii. The weight, or volume and density, for each waste using the units specified in Table 1 (WAC -380(2)(c))? ✓ __

Table 1

Unit of Measure	Symbol	Density
Pounds.	P	
Short tons (2000 lbs) . .	T	
Gallons (U.S.).	G	P/G
Cubic yards	Y	T/Y
Kilograms	K	
Tonnes (1000 kg).	M	
Liters.	L	K/L
Cubic meters.	C	M/C

iv. The date and method of management for each waste, using the handling code(s) specified in Table 2 of WAC -380(2) (WAC -380(2)(d))? ✓ __

d. Does the O/O include in his operating record the location of each waste within his facility and the quantity at each location, and a cross-reference to specific manifest document numbers for each waste that was accompanied by a manifest (WAC -380(1)(b))? ✓ ___

e. If this is a disposal facility, does the O/O include a map or diagram of each cell or disposal area in his operating record to record the location and quantity of each waste (WAC -380(1)(b))? ✓ ___

B. Does the O/O ever manage ignitable, reactive, or incompatible wastes at his facility? ✓ ___

If "Yes":

a. Does the O/O include in his operating record records of the annual inspection by a Fire Marshall or other professional familiar with the Uniform Fire Code (WAC -395(1)(d))? (If "No," then these records must be entered in his inspection log or summary.) ✓ ___

b. Does the operating record include documentation that the O/O manages his ignitable, reactive, or incompatible wastes in accordance with WAC -395(1)(a) and (1)(b) (e.g., does not cause extreme heat or pressure, toxic mists or fumes, damage facility integrity, etc.) (WAC -395(1)(c))? (Note--This documentation may be based on references to published scientific or engineering literature, data from trial tests, waste analyses, or the results of managing similar wastes by similar processes and operating conditions.) ___ ___

C. Does the O/O provide copies of all records, including plans, to WDOE upon request and make them available for inspection at all reasonable times (WAC -380(3)(a))? ✓ ___

D. Will the O/O be sending copies of records of waste <u>disposal</u> locations and quantities at the time of his facility's closure to WDOE, EPA Region X Administrator, and the local land use and planning authority (WAC -380(3)(c))? ___ ___

Comments: The ignitables have been talked about - only in emergencies - where the facility can store until better arrangements.

14. REPORTING (WAC -390).

	Yes	No
A. Unmanifested Waste Reports.	When necessary	
If the O/O receives from off-site a shipment of waste which was not manifested but should have been, then does he submit a Form 6 - Unmanifested Waste Report to WDOE within 15 days of receiving the shipment (WAC -390(1))?		

List the dates below that such reports were sent:

_____ _____

_____ _____

_____ _____

_____ _____

B. Annual Reports.		
a. Does the O/O submit a Form 5-TSD Facility Annual Dangerous Waste Report to WDOE by March 1 of each year reporting the previous calendar year's waste management activities at the facility (WAC -390(2))?	✓	
b. If the O/O ships waste off-site, does he submit a Form 4-Generator Annual Dangerous Waste Report to WDOE by March 1 of each year reporting the wastes for which he acted as a generator during the previous calendar year (WAC -390(2))?	✓	
C. Additional Reports.		
Does the O/O provide the following additional reports to WDOE (WAC -390(3)):		
a. Reports of releases, fires, and explosions as required by the emergency procedures of WAC -360(2)(k)?	✓	
b. Interim status ground water monitoring data, as specified in 40 CFR 265.94(a)(2) and (b)(2) (if applicable)?	✓	
c. Any other reports required by WDOE (list these reports, if any, and dates submitted under Comments, below)?	✓	

Comments: _____

_____

_____

_____

_____

DANGEROUS WASTE COMPLIANCE CHECKLIST/QUESTIONNAIRE, CHAPTER 173-303 WAC
March 1987

* *

PART V: INTERIM STATUS TSD FACILITY UNITS

This part of the checklist/questionnaire is applicable to all TSD facilities operating under interim status, except for those facilities or portions of facilities which are publicly owned treatment works (POTW), or are conducting elementary neutralization, totally enclosed treatment or wastewater treatment as these processes are defined in WAC -040 [Note--These processes are provided a permit by rule under WAC -802(4) and (5) if certain conditions are met. These conditions are certain general facility requirements covered under Part IV: General TSD Facility Requirements of this checklist questionnaire. If these conditions are not met and WDOE has revoked the permit by rule, then some or all of this Part V may be applicable].

The abbreviation "O/O" is used frequently throughout this part of the checklist/ questionnaire and stands for the words "owner and/or operator."

* *

Facility Name Chemical Processors, Inc. EPA/State ID# WAD000812917

Inspector's Name Laurence Ashley Date May 6, 1987

Check the type(s) of unit operations that the O/O conducts at his facility and complete the sections of this Part V of the checklist/questionnaire identified for each type of unit.

: Containers (complete section 1.) ✓

: Tanks (complete section 2.) ✓

: Surface Impoundments (complete section 3.) None

: Piles (complete section 4.) None

: Land Treatment (complete section 5.) None

: Landfills (complete section 6.) None

: Incinerators (complete section 7.) None

: Thermal Treatment (complete section 8.) ✓

: Chemical, Physical, and Biological Treatment (complete section 9.) ✓

		Yes	No
1.	CONTAINERS (40 CFR Part 265 SUBPART I).		
A.	Condition of containers (265.171).		
a.	Are all containers holding wastes in good condition and free of leaks?	✓	
	If "No," describe the number, quantity, and contents of the bad or leaking containers, and describe the specific condition of these containers		
	_____		
	_____		
	_____		
	_____		
	_____		
	_____		
	_____		
b.	If a container is not in good condition or begins to leak, does the O/O either:		
i.	Transfer the waste from the bad containers to a container in good condition?	If necessary	
ii.	Or else manage the waste in same other way that complies with WAC 173-303 (describe these procedures under Comments, below)?		
B.	Management of containers (265.173).		
a.	Are all containers holding wastes kept closed during storage except when adding or removing wastes?	✓	
b.	Are all waste containers being:		
i.	Stored in a manner that prevents leaks or ruptures?	✓	
ii.	Handled in a manner that prevents leaks or ruptures?	✓	
iii.	Opened in a manner that prevents leaks or ruptures?	✓	

C. Ignitable or reactive wastes (265.176). Yes No

a. Are containers holding reactive wastes that are capable of detonation or explosion (designated by WAC -090(7)(a)(vi), (vii) or (viii)) stored with a buffer zone equivalent to the Uniform Fire Code's "American Table of Distances for Storage of Explosives," Table 77-201, 1979 Edition (WAC -440(1)(b))? ✓ __

b. Are containers holding ignitable wastes and reactive wastes (other than those cited in a., above) stored at least fifty feet from the facility's property line? follows Fire Code requirement

D. Container compatibility (265.172) and incompatible wastes (265.177).

a. Are all containers made of or lined with materials which will not react with and are otherwise compatible with the waste to be stored, so that the ability to contain the waste is not impaired? ✓ __

b. Are incompatible wastes or incompatible wastes and materials ever placed in the same container, or are wastes ever placed in unwashed containers which previously held incompatible wastes? __ ✓

If "Yes," are these practices conducted in a manner that assures compliance with WAC -395(1)(b)? (Be sure to complete section 11. of Part IV: General TSD Facility Requirements of this checklist/questionnaire.) __ __

c. If wastes in containers are stored near any wastes or materials that are incompatible, are the waste containers protected from these incompatible wastes or materials by means of a dike, berm, wall, or other device? ✓ __

If "Yes," describe the device.

Distance/wall - EF

E. Secondary Containment.

a. For new container storage areas constructed after September 30, 1986, has the O/O complied with the secondary containment requirements of WAC 173-303-630(7)? (WAC -400(3)(a)(ii)) The facility has no new addition

		Yes	No
b.	If WDOE has required secondary containment on a case-by-case basis, has the O/O complied with WAC 173-303-630(7)? (WAC -400(3)(a)(ii)) To determine this, complete Part II, Section 13, Item I of the checklist.	Not required	

F. Labeling (WAC -395(6)).

		Yes	No
a.	Are containers labeled in a manner which adequately identifies the major risks associated with the contents?	✓	
b.	Are the labels obscured, removed or otherwise unreadable?		✓
c.	Does the O/O destroy or otherwise remove labels from emptied containers (unless the container will continue to be used for storing dangerous waste at the facility)?	✓	

Comments: The main wastes for the Containers are the oily sludges and sludges from the treatment tanks — by CSSI - requirements No free liquids - proof via Paint filter test

2. TANKS (40 CFR PART 265 SUBPART J). Yes No

A. General operation (265.192).

a. Is each tank:

i. In good operating condition? ✓ ___

ii. Free of leaks, cracks, ruptures, seam and fixture weaknesses, and any other problems that could lead to loss of wastes due to structural failures? ✓ ___

If "No," describe any problems that were observed.

tanks are checked daily

b. Does the O/O ever add wastes or treatment reagents to a tank which could cause the tank or its inner liner to rupture, leak, corrode, or otherwise fail before the end of its intended life? ___ ✓

c. For any uncovered tanks, is each tank either:

i. Operated to ensure at least two feet (sixty centimeters) of freeboard? ✓ ___

ii. Or else, equipped with a containment structure (e.g., dike or trench), a drainage control system, or a diversion structure (e.g., standby tank), with a capacity that equals or exceeds the volume of the top two feet (60 cm) of the tank? (Note for calculation purposes: 1 cubic foot = 7.48 gallons; 1 cubic meter = 264.2 gallons.) ___ ___

d. Are any tanks operated with continuous waste feed? ___ ✓

If "Yes":

i. Describe which tanks and wastes are continuous feed systems (if all, just write "All").

The feed is manually operated. Wastes are received, if ok, tank is selected to receive the waste for handled in the main receiving tank the oil separator - 40,000 gallons

Yes No

ii. Are these tanks equipped with a means to stop the waste inflow? — —

Describe the means (e.g., feed cutoff, bypass to standby tank, etc.).

_____

_____

_____

_____

B. Ignitable or reactive wastes (265.198).

a. Are ignitable or reactive wastes ever placed in tanks? — ✓

If "Yes," does the O/O either:

i. Use these tanks solely for emergencies? — —

ii. Or else, store or treat the wastes in such a way that they are protected from materials or conditions which may cause ignition or reaction? — —

iii. Or else, treat, render, or mix the wastes before or immediately after placement in the tank so that the wastes are not ignitable or reactive (by WAC -090(5) and (7)), and so that treating or mixing complies with WAC -395(1)(b)? (Note--If O/O conducts this activity, be sure to complete section 11. of Part IV: General TSD Facility Requirements of this checklist/questionnaire.) — —

Describe which tanks, if any, receive ignitable or reactive wastes.

_____

	Yes	No
_____		
_____		
_____		
_____		
_____		

b. Are tanks holding reactive wastes that are capable of detonation or explosion (designated by WAC -090 (7)(a)(vi), (vii) or (viii)) located with a buffer zone equivalent to the Uniform Fire Code's "American Table of Distances for Storage of Explosives," Table 77-201, 1979 Edition (WAC -440(1)(b))? ___ ___

c. Are covered tanks used for holding ignitable or reactive wastes located with a buffer zone equivalent to the National Fire Protection Association's requirements for tanks, contained in Tables 2-1 through 2-6 of "The Flammable and Combustible Liquids Code - 1981?" ___ ___

C. Incompatible wastes (265.199).

If the O/O conducts the following activities, are these activities conducted so as to comply with WAC -395(1)(b) (Note--If the O/O conducts these activities and compliance with WAC -395(1)(b) is required, be sure to complete section 11. of Part IV: General TSD Facility Requirements of this checklist/questionnaire):

a. Treatment or storage of wastes in tanks? ✓ ___

b. Placement of incompatible wastes, or incompatible wastes and materials in the same tank? ___ ✓

c. Placement of wastes in an unwashed tank which previously held incompatible wastes or materials? ___ ✓

Describe which tanks receive incompatible wastes and what those wastes are.

_____

_____

_____

_____

_____

D. Labels (WAC -395(6); -400(3)(a)(ii); -640(2)(c))

	Yes	No
a. Are all tanks holding dangerous waste marked with labels or signs to identify the contained waste?		Did not Notice at time of Inspection
b. Are the labels or signs legible at a distance of at least 50 feet?		
c. Are the major risks associated with the waste identified?		

Comments: From previous Inspection the labels were noticed ok

3. SURFACE IMPOUNDMENTS (40 CFR PART 265 SUBPART K).	Yes	No
A. Operation and containment (265.222 and 223).		
a. Does the O/O maintain each surface impoundment's freeboard to:		
If no, has a qualified engineer certified that alternative design and operating procedures will prevent overtopping of the dike and such certification is maintained at the facility? (265.222(b))	___	___
i. Be at least two feet (sixty centimeters)?	___	___
ii. Prevent any overtopping of the dike due to overfilling, wave action or a storm (Note--This requirement may result in the need for more than two feet of freeboard.)?	___	___
b. Do all earthen dikes (if any) have a protective cover (e.g., grass, shale, rock) to minimize wind and water erosion and to preserve structural integrity?	___	___
B. Ignitable or reactive wastes (265.229).		
Are ignitable or reactive wastes ever placed in the surface impoundment(s)?	___	___
If "Yes," does the O/O either:		
a. Use the surface impoundment(s) solely for emergencies?	___	___
b. Or else, treat, render, or mix the wastes before or immediately after placement in the surface impoundment(s) so that the wastes are not ignitable or reactive (by WAC -090(5) and (7)), and so that the treating or mixing complies with WAC -395(1)(b)? (Note--If O/O conducts this activity, be sure to complete section 11. of Part IV: General TSD Facility Requirements of this checklist/questionnaire.)	___	___
c. Or manage the waste in such a way that it is protected from any material or conditions which may cause it to ignite or react?	___	___
If yes, has a qualified chemist certified that the design or operation of the facility will prevent ignition or reaction, and is such certification and the basis for it maintained at the facility?	___	___

Describe which surface impoundments (if any) receive ignitable or reactive wastes.

_____

_____

_____

_____

_____

_____

C. Incompatible wastes (265.230)

	Yes	No
Are incompatible wastes or incompatible wastes and materials ever placed in the same surface impoundment(s)?	___	___
If "Yes":		
a. Does the O/O do this in a manner that assures compliance with WAC -395(1)(b)? (Note--Be sure to complete section 11. of Part IV: General TSD Facility Requirements of this checklist/ questionnaire.)	___	___

b. Describe which surface impoundments receive incompatible wastes and what those wastes are.

_____

_____

_____

_____

_____

_____

Comments: _____

_____

_____

_____

_____

4. WASTE PILES (40 CFR PART 265 SUBPART L).	Yes	No
A. Wind protection (265.251).		
If the wastes in the pile(s) could be subject to wind dispersal, does the O/O cover or otherwise manage the pile(s) to prevent wind dispersal?	___	___
B. Containment (265.253).		
Is leachate or runoff from the pile(s) a dangerous waste?	___	___
If "Yes," then does the O/O either:		
a. Protect the pile(s) from precipitation and run-on, and prevent the addition of liquids or wastes containing free liquids to the pile(s)?	___	___
b. Or else, perform <u>all</u> of the following actions:		
i. Place the pile(s) on an impermeable base that is compatible with the wastes under the conditions of treatment or storage?	___	___
ii. Design, construct, operate, and maintain a run-on control system capable of preventing flow onto the active portion of the pile(s) during peak discharge from at least a twenty-five year storm?	___	___
iii. Design, construct, operate, and maintain a run-off management system to collect and control at least the water volume resulting from a twenty-four hour, twenty-five year storm?	___	___
iv. Empty or otherwise manage run-on and run-off collection and holding facilities (e.g., tanks, basins) as quickly as possible to maintain design capacity of the systems? (Note--Collected run-off should be checked to determine if it is dangerous waste and, if so, managed accordingly.)	___	___
C. Ignitable or reactive wastes (265.256).		
Are ignitable or reactive wastes ever placed in the pile(s)?	___	___
If "Yes," does the O/O either:		

	Yes	No
a. Manage the wastes in such a way that they are protected from any materials or conditions which may cause them to ignite or react?	___	___
b. Or else, treat, render, or mix the wastes before or immediately after placement in the pile(s) so that the wastes are not ignitable or reactive (by WAC -090(5) and (7)), and so that the treating or mixing complies with WAC -395(1)(b)? (Note--If O/O conducts this activity, be sure to complete section 11. of Part IV: General TSD Facility Requirements of this checklist/questionnaire.)	___	___

Describe which pile(s) (if any) receive ignitable or reactive wastes.

_____

_____

_____

_____

_____

D. Incompatible wastes (265.257).

a. Are incompatible wastes, or incompatible wastes and materials ever placed in the same pile(s), or are wastes ever piled on the same area(s) where incompatible wastes or materials were previously piled without the area(s) being decontaminated?	___	___
If "Yes":		
i. Does the O/O do this in a manner that assures compliance with WAC -395(1)(b)? (Note--Be sure to complete section 11. of Part IV: General TSD Facility Requirements of this checklist/questionnaire.)	___	___

ii. Describe which pile(s) receive incompatible wastes and what those wastes are.

_____

_____

_____

_____

_____

b. If a pile of waste is incompatible with any waste or other material stored nearby in other containers, piles, open tanks, or surface impoundments, then does the O/O separate the pile from the other incompatible wastes or materials or otherwise protect them by means of a dike, berm, wall, or other device?

Yes ___ No ___

Describe the device(s) used to separate and protect the incompatible wastes or materials.

_____

_____

_____

_____

_____

_____

Comments: _____

_____

_____

_____

_____

_____

_____

_____

5. LAND TREATMENT (40 CFR PART 265 SUBPART M). Yes No

A. General operation (265.272).

a. Is the land treatment unit effective in making the applied wastes less hazardous or nonhazardous by degradation, transformation, or immobilization process occurring in or on the soil? ___ ___

If "No," describe the basis for this determination.

_____

_____

_____

_____

_____

b. Has the O/O designed, constructed, operated, and maintained a run-on control system capable of preventing flow onto active portions during peak discharge from at least a twenty-five year storm? ___ ___

c. Has the O/O designed, constructed, operated, and maintained a run-off management system capable of collecting and controlling a water volume at least equivalent to a twenty-four hour, twenty-five year storm? ___ ___

d. Are collection and holding facilities (e.g., tanks, basins) associated with run-on and run-off control systems emptied or otherwise managed expeditiously after storms to maintain design capacity of the systems? (Note--Run-off may be a dangerous waste and, if designated, must be managed appropriately.) ___ ___

e. If the treatment zone contains particulate matter which may be subject to wind dispersal, does the O/O manage the unit to control wind dispersal? ___ ___

What method(s) does he use?

_____

_____

_____

_____

B. Unsaturated zone monitoring (265.278).

	Yes	No
a. Does the O/O have in writing and does he implement an unsaturated zone monitoring plan?		
Is the plan designed to:		
i. Detect the vertical migration of waste and waste constituents under the active portions?		
ii. Provide information on the background concentrations of the waste and waste constituents in similar but untreated soils nearby?		
b. Does the O/O keep the monitoring plan and the rationale used in developing the plan at his facility?		
c. Does the monitoring plan include, at a minimum:		
i. Soil monitoring using soil cores?		
ii. Soil-pore water monitoring using devices such as lysimeters?		
d. In order to detect the vertical migration of waste and waste constituents below the active portions of his facility, does the O/O demonstrate in his monitoring plan that:		
i. The depth at which soil and soil-pore water samples are to be taken is below the depth to which waste is incorporated into the soil?		
ii. The number of soil and soil-pore water samples to be taken is based on the variability of:		
1. The waste constituents (as identified in the facility waste analysis plan) in the waste and soil?		
2. The soil types?		
iii. The frequency and timing of soil and soil-pore water sampling is based on the frequency, time, and rate of waste application, proximity to ground water, and soil permeability?		
e. Does the O/O analyze the soil and soil-pore water samples for the waste constituents that were found in the waste during analysis under his waste analysis plan?		

C. Ignitable and reactive wastes (265.261).

	Yes	No
Are ignitable or reactive wastes ever land treated?		
If "Yes," does the O/O either:		
a. Manage the waste in such a way that it is protected from any material or condition which could cause it to ignite or react?		
b. Or else, treat, render, or mix the wastes before or immediately after placement in the land treatment unit(s) so that the wastes are not ignitable or reactive (by WAC -090(5) and (7)), and so that the treating or mixing complies with WAC -395(1)(b)? (Note--If O/O conducts this activity, be sure to complete section 11. of Part IV: General TDS Facility Requirements of this checklist/questionnaire.)		

Describe which land treatment units (if any) receive ignitable or reactive wastes.

_____

_____

_____

_____

_____

_____

D. Incompatible wastes (265.282).

	Yes	No
Are incompatible wastes or incompatible wastes and materials ever placed in the same land treatment unit(s)?		
If "Yes":		
a. Does the O/O do this in a manner that assures compliance with WAC -395(1)(b)? (Note--Be sure to complete section 11. of Part IV: General TSD Facility Requirements of this checklist/questionnaire.)		
b. Describe which land treatment units receive incompatible wastes and what those wastes are.		

_____

_____

_____

E. Food chain crops (265.276).

	Yes	No
Does the O/O grow food chain crops on the treated areas of any of his land treatment units?		
If "No," then do not answer the remaining questions under this item. If "Yes," then continue with the remaining questions.		
a. Has the O/O notified WDOE that he is growing food chain crops on his land treated areas?		
b. Can the O/O demonstrate, based on field testing, that any arsenic, lead, mercury, or other waste constituents identified pursuant to the facility waste analysis plan will either:		
i. Not be transferred to the food portion of the crop by plant uptake or direct contact, and will not otherwise be ingested by food chain animals?		
ii. Or else, not occur in greater concentrations in the crops grown on the land treatment facility than in the same crops grown on untreated soils under similar conditions in the same region?		
c. When making either of the demonstrations described under b., above, is the information used to make the demonstration:		
i. Kept at the facility?		
ii. Based on tests for the specific waste and application rates being used at the facility?		
iii. Inclusive of descriptions of crop and soil characteristics, sample selection criteria, sample size determination, analytical methods, and statistical procedures?		
d. Does the waste applied to treatment areas where food chain crops are grown contain cadmium?		
If "Yes," does the O/O satisfy the requirements of either e. or f., below?		

e. Does the O/O perform or assure that all of the following actions occur: Yes No

i. Unless the waste contains two mg/kg (dry weight) cadmium or less, is the pH of the waste and soil mixture 6.5 or greater at the time of each waste application? ___ ___

ii. If the land treatment area is used for production of tobacco, leafy vegetables or root crops for human consumption, is the annual application of cadmium from waste less than 0.5 kilograms per hectare (kg/ha)? (Note--One hectare equals 10,000 square meters, and equals 2.741 acres.) ___ ___

iii. For any other food chain crops, is the annual application of cadmium from waste less than:

1. 1.25 kg/ha from July 1, 1984 to December 31, 1986? ___ ___

2. 0.5 kg/ha beginning January 1, 1987? ___ ___

iv. If the background soil pH is greater than 6.5, or if the pH of the waste and soil mixture is adjusted to and maintained at 6.5 (even though the background soil pH is less than 6.5) while crops are grown, then is the cumulative application of cadmium from waste less than the amounts shown in the following table? ___ ___

Soil Cation Exchange Capacity (meq/100g)	Maximum Cumulative Application (kg/ha)
Less than 5	5
5 to 15	10
Greater than 15	20

v. If the background soil pH is less than 6.5 (and the waste/soil mixture pH is not adjusted to 6.5 or greater while crops are grown), is the cumulative application of cadmium from waste less than 5.0 kg/ha? ___ ___

f. Or, does the O/O perform or assure that all of the following actions occur:

i. Is animal feed the only food chain crop produced? ___ ___

		Yes	No
ii.	Is the pH of the waste and soil mixture at the time of waste application or at the time the crop is planted, whichever occurs later, at 6.5 or greater?	___	___
iii.	Is a pH of 6.5 or greater in the waste and soil mixture maintained whenever food chain crops are grown?	___	___
iv.	Is there a facility operating plan which demonstrates how the animal feed will be distributed to prevent ingestion by humans?	___	___
v.	Does the facility operating plan describe the measures to be taken to safeguard against possible health hazards from cadmium entering the food chain, which may result from alternative land uses?	___	___
vi.	Is there a stipulation in the land record or property deed which states that the property has received waste at high cadmium application rates and that food chain crops must not be grown except in compliance with the actions described in f. i. through vi., above?	___	___

Comments: _____

6. LANDFILLS (40 CFR PART 265 SUBPART N).

Yes No

A. General operation (265.302).

a. Has the O/O designed, constructed, operated, and maintained a run-on control system capable of preventing flow onto active portions during peak discharge from at least a twenty-five year storm? ___ ___

b. Has the O/O designed, constructed, operated, and maintained a run-off management system capable of collecting and controlling a water volume at least equivalent to a twenty-four hour, twenty-five year storm? ___ ___

c. Are collection and holding facilities (e.g., tanks, basins) associated with run-on and run-off control systems emptied or otherwise managed expeditiously after storms to maintain design capacity of the systems? (Note--Run-off may be a dangerous waste and, if designated, must be managed appropriately.) ___ ___

d. If the landfill contains particulate matter which may be subject to wind dispersal, does the O/O manage the unit to control wind dispersal? ___ ___

What method(s) does he use?

_____

_____

_____

_____

_____

_____

e. Does the O/O assure that wastes which are designated as organic carcinogens or EHW are never disposed of in his landfill (WAC -400(3)(b)(ii))? ___ ___

B. Ignitable or reactive wastes (265.312).

Are ignitable or reactive wastes ever placed in the landfill? ___ ___

If "Yes," does the O/O either:

a. Treat, render, or mix the wastes before or immediately after placement in the landfill so that the wastes are not ignitable or reactive (by

WAC -090(5) and (7)), and so that the treating or mixing complies with WAC -395(1)(b)? (Note--If O/O conducts this activity, be sure to complete section 11. of Part IV: General TSD Facility Requirements of this checklist/questionnaire.)

Yes No

b. Or else, for ignitable wastes only:

i. Landfill the wastes only in nonleaking containers?

ii. Dispose the wastes in such a way that they are protected from materials and conditions (e.g., heat, sparks, rupture) that may cause the wastes to ignite?

iii. Cover the wastes daily with soil or other noncombustible material to minimize ignition potential?

iv. Prevent disposal of the wastes in cells that contain or will contain other wastes which may generate heat sufficient to cause ignition of the wastes?

Describe which landfill cells (if any) receive ignitable or reactive wastes.

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C. Incompatible wastes (265.313).

Are incompatible wastes or incompatible wastes and materials ever placed in the same landfill cell?

If "Yes":

a. Does the O/O do this in a manner that assures compliance with WAC -395(1)(b)? (Note--Be sure to complete section 11. of Part IV: General TSD Facility Requirements of this checklist/questionnaire.)

b. Describe which landfill cells (if any) receive incompatible wastes and what those wastes are.

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D. Liquid waste (265.314).

	Yes	No
a. Does the O/O ever receive (or generate, if disposing of his own wastes) bulk or noncontainerized liquid wastes for disposal in his landfill?		
If "Yes," is this waste either:		
i. Solidified or chemically fixed to be a solid prior to disposal?		
ii. Mixed with absorbent and placed in containers for disposal?		
b. Does the O/O ever landfill containers which hold free liquids?		
If "Yes," are all such containers either:		
i. Very small, such as an ampule?		
ii. Or, designed to hold free liquids for use other than storage (e.g., battery, capacitor)?		
iii. Or, labpacks (overpacked drums)? (If "Yes," be sure to complete the questions for labpacks, below.)		
iv. Or, managed so that all free-standing liquid has been: removed (decanted or drained); mixed with absorbent or solidified; or otherwise eliminated?		

E. Containers and labpacks (265.315 and 316).

	Yes	No
a. Are empty containers crushed flat, shredded, or similarly reduced in volume to the maximum extent possible before burial?		
b. If not empty, are the containers at least 90% full when placed in the landfill?		

		Yes	No
c.	Does the O/O place overpacked drums (labpacks) in the landfill?		
	If "Yes," does the O/O observe the following requirements:		
i.	Are all inside containers sealed tightly, nonleaking, and made of materials that will not react with or be ignited or decomposed by the wastes they contain?		
ii.	If DOT regulations (49 CFR Parts 173, 178, and 179) specify particular inside containers for the wastes, are these regulations followed?		
iii.	Are the inside containers overpacked in an open head DOT specification metal shipping container (49 CFR Parts 178 and 179) of no more than 110 gallons (416 liters) capacity?		
iv.	Is the overpack container filled with absorbent material sufficient to absorb the liquid contents of all inside containers and to completely fill the overpack container (i.e., no partially full overpack containers may be landfilled; extra space must be filled with absorbent)?		
v.	Are the absorbent materials used not capable of reacting with or being ignited or decomposed by the contents of the inner containers?		
vi.	Does the O/O assure that incompatible wastes are not enclosed in the same overpack container?		
vii.	Are all reactive wastes, other than cyanide or sulfide bearing reactive wastes, treated or rendered nonreactive prior to overpacking?		

Comments: _____

7. INCINERATORS (40 CFR PART 265 SUBPART O).

	Yes	No
A. Exemption from incinerator standards (265.340).		
Does the O/O burn only the wastes described below, and has he documented, in writing, that the wastes would not reasonably be expected to contain any of the dangerous waste constituents listed in WAC 173-303-9905, and is this documentation retained at his facility?	___	___
a. Wastes listed as dangerous solely because they are ignitable and/or corrosive, or wastes designated as dangerous solely because of the characteristics of ignitability and/or corrosivity; and		
b. Wastes listed as dangerous or designated by the characteristics as dangerous solely due to the reactivity characteristics of WAC 173-303-090 (7)(a)(i), (ii), (iii), (vi), (vii), or (viii), provided that these wastes are not burned when other dangerous wastes are present in the combustion zone.		
If "Yes," then the O/O is exempt from all interim status incinerator requirements except 265.351, Closure. Complete only those questions under item C. Closure, below.		
B. Operation (265.345 and 347(a)).		
a. During startup and shutdown of the incinerator, does the O/O assure that wastes are not fed to the incinerator unless steady state conditions of operation have been achieved (including steady state operating temperature and air flow)?	___	___
b. Does the O/O immediately make appropriate corrections, either automatically or manually, to maintain steady state combustion conditions whenever necessary?	___	___
C. Closure (265.351).		
At closure, will (or has) the O/O remove all wastes and waste residues from the incinerator (including but not limited to ash, scrubber waters, and scrubber sludges) and, if designated as dangerous wastes, manage them accordingly? (Note--This responsibility and measures for accomplishing associated actions must be specified in the O/O's closure plan.)	___	___

Comments: _____

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8. THERMAL TREATMENT (40 CFR PART 265 SUBPART P).

	Yes	No
A. Operation (265.373 and 377(a)(1) and (2)).		
a. Unless his process is a noncontinuous (batch) thermal treatment process which requires a complete thermal cycle to treat discrete quantities, does the O/O bring his process to steady state (normal) conditions of operation using auxiliary fuel or other means prior to adding dangerous wastes?		Heat is used to break up oil emulsion and other emulsified liquids. goes to 190°F
b. Does the O/O immediately make appropriate corrections, either automatically or manually, to:		
i. Maintain steady state or other appropriate thermal treatment conditions whenever necessary?		
ii. Return any visible air emissions to their normal appearance whenever changes in appearance occur?		
B. Closure (265.381).		
At closure, will (or has) the O/O remove all wastes and waste residues from the thermal treatment process and equipment (including but not limited to ash, scrubber waters and scrubber sludges) and, if designated as dangerous wastes, manage them accordingly? (Note--This responsibility and measures for accomplishing associated actions must be specified in the O/O's closure plan.)	✓	
C. Open burning of waste explosives (265.382).		
a. Does the O/O ever open burn or detonate waste explosives (e.g., military propellants, dynamite, fireworks) which cannot be safely disposed of through other modes of treatment? (Note--Open burning of any other types of dangerous wastes is prohibited.)		✓
b. If "Yes," does the O/O conduct such open burning or detonation in a manner that protects public health and the environment, and in accordance with the following table?		

Pounds of waste explosives	Minimum distance of open burning/detonation to property of others
0 to 100	670 feet (204 m.)
101 to 1,000	1,250 feet (380 m.)
1,001 to 10,000	1,730 feet (530 m.)
10,001 to 30,000	2,260 feet (690 m.)

Comments: Heat is used in breaking up emulsions - The heat is steam provide by a boiler - T = 190°F

9. CHEMICAL, PHYSICAL, AND BIOLOGICAL TREATMENT (40 CFR PART 265 SUBPART Q).

	Yes	No
A. Operation (265.401).		
a. Does the O/O assure that wastes or treatment reagents are not introduced to the treatment process or equipment if they could cause ruptures, leaks, corrosion, or other failures?	✓	
Describe how the O/O makes these assurances: by the knowledge of the formula used in the treating of the waster - by knowledge of how/what needs to be added when.		
b. Where waste is continuously fed into the treatment process or equipment, is the equipment or process equipped with a means to stop the inflow (e.g., waste feed cutoff system, bypass system)?	✓	
c. When treating wastes, does the O/O assure that the treatment is conducted so as not to:		
i. Generate extreme heat or pressure, fire, or explosion or violent reaction?	✓	
ii. Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health or the environment?	✓	
iii. Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fires or explosions?	✓	
iv. Damage the structural integrity of the facility or device containing the wastes?	✓	
v. Through other like means, threaten human health or the environment?	✓	
Describe how the O/O makes these assurances: By the knowledge of the reactions that are taken place - prechecking wastes to assure No Hzg levels		

of concern elements

B. Ignitable or reactive wastes (265.405). Yes No

If ignitable or reactive wastes are placed in a treatment process or equipment, does the O/O treat, render, or mix the wastes before or immediately after placement in the treatment process or equipment so that the wastes are not ignitable or reactive (by WAC -090(5) and (7)), and so that the treating or mixing complies with WAC -395(1)(b)? (Note--If O/O conducts this activity, be sure to complete section 11. of Part IV: General TSD Facility Requirements of this checklist/questionnaire.)

See section 11 of Part IV

— —

Indicate which treatment units receive ignitable or reactive wastes:

_____

_____

_____

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C. Incompatible wastes (265.406).

Are incompatible wastes or incompatible wastes and materials ever placed in the same treatment process or equipment, or are wastes ever placed in unwashed treatment equipment which previously held incompatible wastes or materials?

See section 10 of Part IV

— —

If "Yes":

a. Does the O/O do this in a manner that assures compliance with WAC -395(1)(b)? (Note--Be sure to complete section 10. of Part IV: General TSD Facility Requirements of this checklist/questionnaire.)

b. Describe which treatment processes or equipment receive incompatible wastes and what those wastes are.

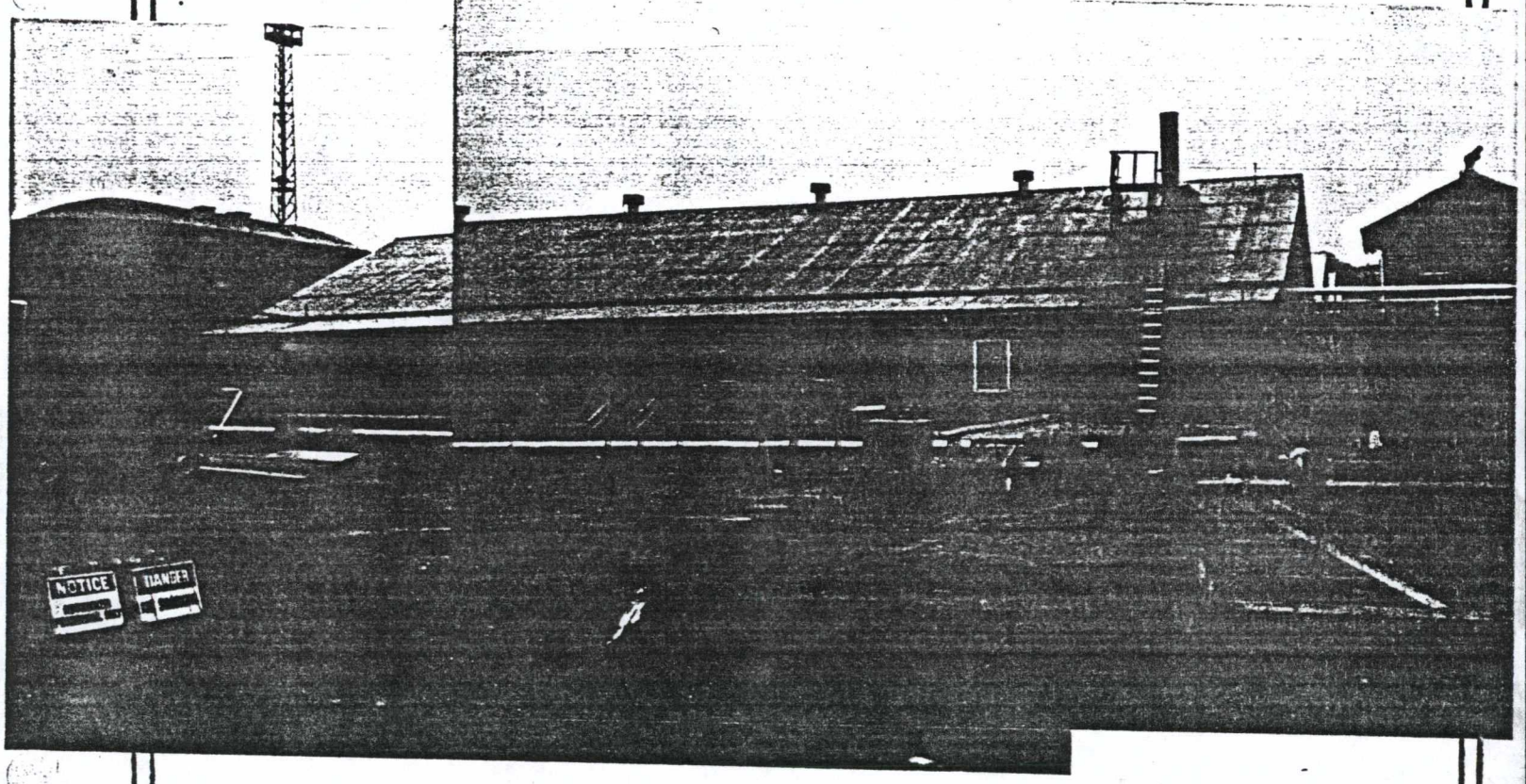
_____

_____

D. Closure (265.404).

	Yes	No
At closure, will (or has) the O/O remove all wastes and waste residues from treatment processes or equipment, discharge control equipment, and discharge confinement structures and, if designated as dangerous wastes, manage them accordingly? (Note--This responsibility and measures for accomplishing associated actions must be specified in the O/O's closure plan.)	✓	

Comments: The facility deals with oily wastes and low level hazardous wastes which can be treated to render non-hazardous. This is done through a screening tests of profile of wastes coming to facility

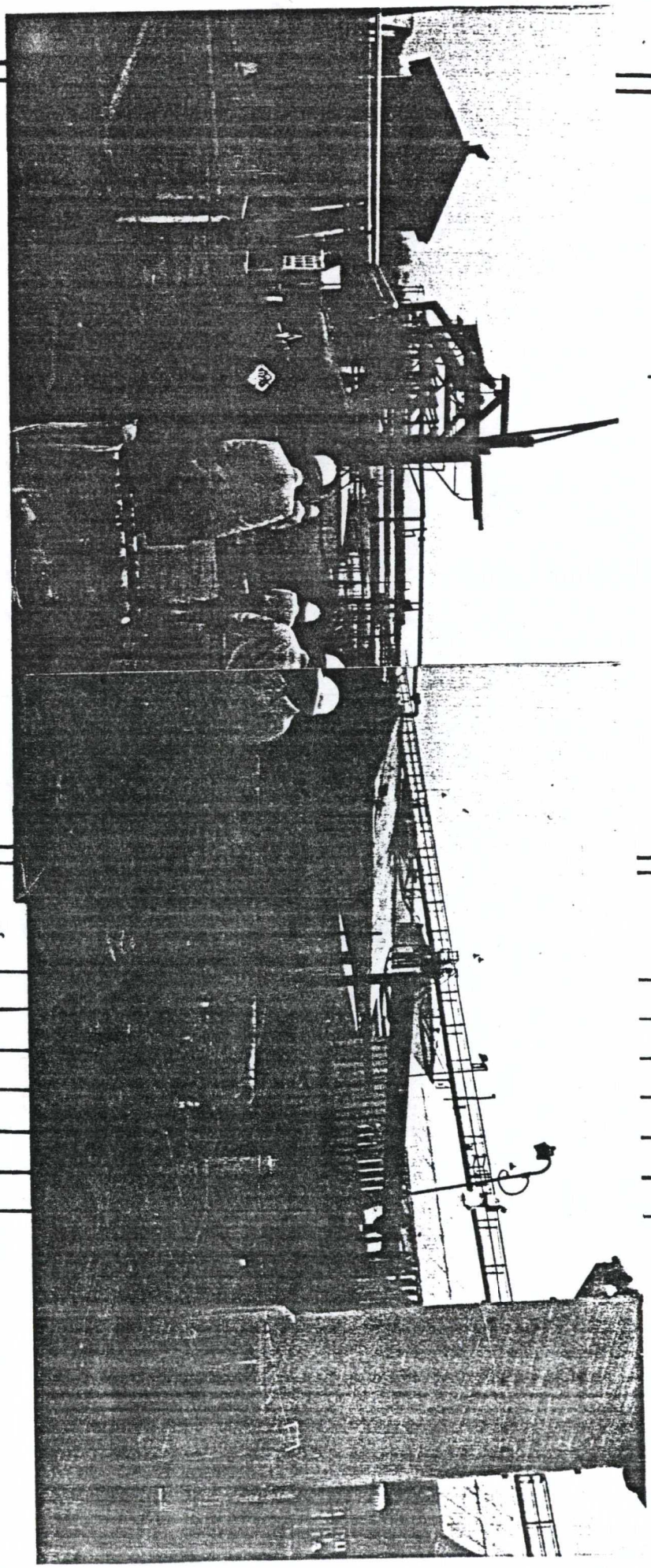


1. PHOTO NO. one/two - composite
2. SITE LOCATION Pier 91 - Seattle - King County, Washington
3. SITE DESCRIPTION Main Buildings at site.
4. DATE July 15, 1986
5. TIME 1020 hours
6. LOGBOOK NO.& PAGE
7. PHOTOGRAPHER L. Ashley

1- The center building is the office building, boiler room; storage-containers.

2- Building to left is where the foam fire fighting apparatus is located.

3- Building to right is where - top level (window) wet chemistry on samples from treatment/shipments



1. PHOTO NO. Three/Four Composite
2. SITE LOCATION Pier 91
3. SITE DESCRIPTION Main Receiving area
4. DATE July 15, 1986
5. TIME 1030
6. LOGBOOK NO. & PAGE
7. PHOTOGRAPHER L. Ashley

Composite Photo of Main receiving area - Center Right is the location of the underground oil/water Separator.

Chemical Processors, Inc.
Pier 91 facility
Seattle